August 9, 2017

Ms. Mary Gable, Assistant State Superintendent
Division of Student, Family and School Support
200 West Baltimore Street
Baltimore, Maryland 21201

Mr. Andrew Smarick, President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Ms. Gable and Mr. Smarick,

The Maryland Education Equity Coalition (Coalition), a group of stakeholders committed to excellence
and equity in Maryland Public Schools, applauds the Maryland State Department of Education (MSDE)
in the drafting of Maryland's Consolidated State Plan (Plan) in accordance with the Every Student
Succeeds Act (ESSA). The second draft of the Plan reflects the significant work MSDE has conducted to
develop a detailed strategy for implementation of ESSA. This undertaking includes multifaceted efforts to
incorporate input from external stakeholders including our Coalition.

We wish to offer feedback on the second draft of the Plan that we believe will ensure that every student
will succeed in Maryland. We underscore the importance of administering the Plan in a way that is
appropriately aligned to, and coordinated with, federal and state programs, statutes, and regulations,
including the Maryland Protect Our Schools Act and COMAR. We have also included an attachment with
the letters we submitted in response to the first draft of the Plan. These letters provide additional context to
our recommendations.

This Plan is an opportunity for Maryland to be a leader in school reform and improve outcomes for our
children and youth. Now is the time for Maryland to shift from an outcomes-only, summative approach
to a focus on what drives positive outcomes for children, which could guide school personnel to
understand root causes and strategically and systematically address areas for improvement. We have
found that clear, consistent systems and structures established in schools correlate with high performance.
By focusing measurement and accountability systems on what and how adults optimize schools for
learning, the accountability structure could provide information about where and how to change as well as
reveal for parents where desirable activities are taking place.

Our members are particularly concerned about the following issues in the second draft of the Plan:
❖ Chronic Absence vs. "Persistent Attendance"
❖ N-size
❖ Technical Issues with Growth Measure
❖ Comparing Schools with Similar Demographics
  and/or within an LEA
❖ Use of FARMs as Student Subgroup
❖ Special Populations (Youth in Foster Care,
  Youth Experiencing Homelessness)
❖ Education of Migratory Children
❖ Early Childhood
❖ School Conditions
❖ Identification of Targeted and Comprehensive
  Improvement Status
❖ Teacher Preparation
❖ Continued Stakeholder Engagement

Below we have addressed each of these issues. Additional information on select topics can be found in the attached memos from organizational members of the Coalition. We would be happy to provide any other information on these topics that will assist the members of this esteemed State Board in making the complex and crucial decisions before final submission of the Plan in September.

Chronic Absence
This Coalition continues to encourage the inclusion of chronic absence in the Plan; we do, however, have recommendations to make the measure more robust and meaningful.

We recommend reporting chronic absence for all students and all subgroups, especially for youth experiencing homelessness, youth in foster care, and migratory youth. Reporting for these youth is necessary if the factors that lead to their often interrupted school careers are to be recognized and addressed. We also recommend that school and district level reports include grade level information on chronic absence K-12 to allow for meaningful differentiation between grades as research has shown that certain grade levels and transition years tend to have higher rates of absenteeism.

We recommend that Maryland's chronic absence measure be changed to include students who have been enrolled less than 90 days. The state's current definition ensures that children who are highly mobile, just arriving in school, and/or transitioning from one school level to another are excluded for the first three months – the very period when regular attendance is most important and likely to be the most challenging for students. Research shows that good attendance during this period is critical to success in a new school; poor attendance is highly predictive of disengagement and school failure. Abandoning the current definition will also prevent comparisons with prior years. We recommend using a 10 day minimum of enrollment rather than the 90 day minimum to allow for early identification of students who are at-risk of chronic absence and to allow for the inclusion of students who are more likely to be mobile.

While we appreciate the Board's desire to use a positive metric for attendance, we recommend that it retain "chronic absence," rather than adopt "persistent attendance" as a school quality/student success measure. Persistent attendance can give the impression that 91% attendance is good attendance, something that is not generally accurate. Students have to attend at a rate of 95% or higher to be considered at low risk of school failure due to attendance issues. We also believe that reporting chronic absence levels will provide greater encouragement to schools and districts to intervene quickly with low attending children, than would reporting persistent attendance. We recommend adopting chronic absence as a measure of school quality first or alternatively satisfactory attendance missing 5% or less of days on a roll (absent 9 or fewer days) as an alternative positive measure.

We recommend that chronic absence, as well as other non-academic school quality measures, be included in Maryland's rubric for identifying Comprehensive or Targeted Improvement Status schools. Perhaps the most significant difference between ESSA and NCLB is that ESSA recognizes the importance of measures other than standardized test scores, while NCLB did not. The school quality measures chosen by the Board provide critical information and should not be omitted. Chronic absence, in particular, has a considerable research base behind it; there are even studies that show that chronic absence is stronger indicator of post-secondary success than test scores.

[For additional information, see attached letter from Attendance Works and Greater Baltimore Urban League]

N-Size
We are concerned that in changing Maryland's "n" size from 5 to 10, a number of students and schools will be eliminated from accountability reporting. Although we appreciate that the "n" size is

still relatively low and we are not asking that the "n" size be changed back to 5, we would appreciate an explanation as to how MSDE will assure responsibility for the educational progress of those students who will not be included in the accountability system, primarily more than 99% of Native American and Alaska Native students and about 10% of English Learners. Use of a cell size of 5, allows the inclusion of more student subgroups who may represent small minorities in a school, but introduces a lot of volatility to any measures. In contrast, use of a cell size of 10, leads to the exclusion of student subgroups who may represent small minorities in a school, but reduces the volatility of any measures. Even at 10, annual swings can be large and hard to interpret. We would like there to be clear recognition of the limitations and caveats of size selected.

Technical Issues with the Growth Measure

Growth Measures, while still popular, have been long challenged by technical issues that have never been completely resolved (e.g., Condie, Lefgren, & Sims, 2015). Our concerns include:

- ❖ The metric includes only students with two consecutive years of scores. The most fragile students are most likely to be excluded from a metric requiring consistent year-to-year enrollment.
- ❖ Student growth is based on a starting position of students with a particular score in the baseline year. No controls are suggested for specific students such as receipt of special education services, or ELL. Comparing growth between similar students would be more accurate and equitable.
- ❖ Moreover, research has consistently shown that students already performing at higher rates grow at greater rates than lower performing students (Downey, Von Hippel & Broh, 2004). How does including growth help lower performing students or schools?
- ❖ We recommend a criterion-based ranking rather than a percentile rank
    - o Percentile scores have medians which divide the distribution in half, but may not correspond to an actual score in the distribution (rankings are not complete, values may be missing). Scale score growth is not linear, so corresponding percentiles representing scale score change and have no clear interpretation. Interpreting a percentile rank requires a reference group to which the score is being compared. Unfortunately, as described, the reference group will change annually, as students enter and exit the reference group. This will impact measures at a school, LEA or SEA. Reference to a criterion would be preferable.
    - o As a relative measure, percentiles create an equal number of "winners" and "losers" (above and below the median). This relative ranking system is not based on a criterion that all schools could hypothetically meet, but guarantees the system will determine that half of the schools are making "less than average" growth.
    - o It is not clear how the SPG model accounts for measurement error. The current model "assumes" a student's percentile rank is accurate with no error, and a student's raking in each year is a "true" measure. While measurement uncertainty may have been accounted for when determining scale scores (as in an IRT model), once the scores are produced and transitioned to a ranking, that uncertainty is lost. As a result, reported gains or losses could be a result of measurement error and not true gains or losses.
- ❖ And finally, if the long-term goal is: "To reduce by half the number of students who are not proficient by 2030" why is proficiency not incorporated into the growth model? How does this use of growth get Maryland to its goal?

[For additional information see attached letter from the Baltimore Education Research Consortium]

Percentile Rankings and Comparing Schools with Similar Demographics

We strongly urge MSDE to include a mechanism to view the school demographics and compare similar schools within an LEA (or group of LEAs) in its accountability framework.

These comparable schools provide a context within which to understand performance. It provides the opportunity to look to similarly-situated, well-performing schools as models and gives a morale boost to spur even better performance. Schools with less than 10% students receiving free/reduced priced meals would not be compared to schools serving populations with over 60%.

There is substantial research that shows that school demographics and resources impact outcomes. Therefore, it is essential that the public have the opportunity to review and compare summative ratings within this context. This would mean including, for example, the number of highly qualified teaching staff in the building and the proportion of students from economically disadvantaged households. The inclusion of school characteristics will provide greater transparency and allow parents and community members to view growth and programmatic progress for subgroups as well.

In addition to providing greater transparency, school comparison data is necessary in order for the plan to meet the requirements of state law. Under the "Protect Our Schools Act," SB 871, the state is directed to incorporate "a methodology that compares schools that share similar demographic characteristics." Thus, the failure to include this aspect in the plan is not only a disservice to parents and school communities, it is also a violation of state law.

Use of FARMs as Student Subgroup
We recommend using Direct Certification for all children and schools in Maryland, particularly those participating in the Community Eligibility Provision (CEP). Currently in 241 schools across the state (including the entirety of Baltimore City, Somerset and Dorchester Counties), CEP allows nearly 103,000 Maryland students to eat free breakfast and lunch, and districts are no longer required to collect Free/Reduced Price Meal (FARMs) forms. USDA supports this practice to increase efficiency and accuracy in data collection, and is a stricter, means-tested measure of poverty than FARMS forms.

As these schools are already currently using Direct Certification as a proxy for poverty, and no longer collect FARMS data, we would encourage this practice be supported in the Plan as a best practice for schools participating in CEP.

Special Populations (Foster Youth, Homeless Youth)
In reviewing this most recent draft of the Plan, we are disheartened by the changes made regarding Homeless Students and Students in Out of Home Placements from the earlier draft. We would like to see several sections restored from the earlier draft. With regard to homeless students we would like to see the following changes:
- ❖ Restore language from December 2016 proposed state plan detailing robust strategies for identifying homeless children and youth, especially hard-to-reach populations like doubled up children and youth, immigrant youth, and unaccompanied homeless youth
- ❖ Restore language from December 2016 proposed state plan establishing minimum standards for training of LEA personnel on the needs and rights of homeless students
- ❖ Require that each LEA designate a homeless education liaison with sufficient capacity and support to carry out the duties of that office, in accordance with law and best practice
- ❖ Remove limitation on guaranteeing public pre-K access to homeless students only "where availability exists" and require public pre-K programs to coordinate with Child Find to identify and enroll homeless 4 year olds
- ❖ Eliminate barriers to homeless students' participation in extracurricular and academic activities
- ❖ Establish clear timelines for the provision of transportation to homeless students
- ❖ Strengthen and specify procedures for robust oversight of LEA activities for homeless students

With regard to students in Out of Home Placements, we urge the final Plan restore the language from December 2016 proposed state plan requiring LEAs to employ procedures to ensure educational stability for students in out of home care, and further detail those procedures and requirements.

[For additional information, see attached letter from the Public Justice Center and Advocates for Children and Youth].

Education of Migratory Children
The Plan still does not recognize or prioritize migratory students with disabilities, a particularly vulnerable population because the lengthy timeline for the special education process may not match the migratory work timeline. IEPs and other special education records are not mentioned in the provision about collection and transfer of records. MSDE's general supervisory responsibilities under the Individuals with Disabilities Education Act (IDEA) include making sure that local school systems find and assess children with disabilities within their jurisdiction and make a free appropriate public education available to them. This includes migratory students with disabilities.

We recommend the inclusion of a provision in the Plan that if a migratory student moves from one jurisdiction to another while in the middle of assessment or IEP development or another stage of the special education process, the receiving district will pick up where the sending district left off and that special education, health and other records, will transfer through the Migrant Education Program.

Early Childhood
We are concerned with school transitions, use of funds, improving skills of educators, and school conditions for early childhood. Specifically, include how the State will support and hold LEAs accountable for the requirement in ESSA (ESEA section 1119) for any LEA that receives Title I funds to develop agreements with Head Start programs, and, if feasible, other early learning programs that serve children who will attend the LEA (regardless of whether the LEA uses Title I funds to operate an early education program) to coordinate services, such as data reporting and sharing, alignment of standards and curricula, and transition activities for children moving from early education programs into public school programs.

Regarding Title II, Part A, we recommend including building leadership capacity to implement an aligned and coordinated Preschool through 3rd grade system. We also recommend including how the State will support opportunities for principals, other school leaders, teachers, paraprofessionals, early childhood education program directors, and program providers to participate in joint efforts to address the transition to elementary school, including issues related to school readiness, meeting the needs of children through age 8, increasing the knowledge base on measuring progress, and identification of gifted and talented students at an early age to support their educational path.

Lastly, we want to ensure that ESSA reflects the recently enacted legislation banning the suspensions and expulsions of prekindergarten to second grade students, and include instructions for data collection and strategies to address disproportionality.

School Conditions
We believe the discipline section of the Plan is too narrow. The law requires the plan to describe how the SEA will support LEAs to improve learning conditions for students including overuse of discipline practices that remove students from the classroom. The draft would do this by focusing exclusively on fully implementing programs and strategies that address the mental and behavioral health of students by connecting students to school based professionals and community resources and training school staff in identifying students in need.

The current COMAR discipline provisions, contained within Title 13A-08-01, emphasize the need to keep students in school with suspension as a last resort. The Plan focus should be to keep students in school. One way to do that is to fully implement the strategies and programs noted in the draft. Just as important is for MSDE to ensure that LEAs fully comply with COMAR, to end LEA practices of informal suspension (where students are sent home but not suspended) and "administrative transfer" (where students are moved to another school without the school complying with the suspension rules because they label the action transfer instead of suspension), to ensure that schools apply with fidelity the requirements that apply to students with disabilities who have IEPs or 504 plans and to ensure that schools fully implement "child find" requirements under 504 and the IDEA so that they recognize that behavior problems that lead to discipline suggest the need to consider the appropriateness of behavior plans, IEPs and 504s that are in place and, where they are not in place, the need to assess whether the behavior leading to suspension is based on a disability.

Maryland cannot simply "continue", as the Plan proposes, to provide technical assistance and to implement the same activities currently underway. Restraint and seclusion are invasive practices that cause emotional trauma and can cause physical injuries or even death. MSDE must develop a more robust plan for addressing these aversive practices. We urge that the Plan reflect the positive steps that have been made in Maryland statutes and regulations over the past several years aimed at reducing disproportionality and making discipline policies and practices fair and appropriate.

Identification of Targeted and Comprehensive Improvement Status
The Plan suggests that Maryland only include academic achievement and student growth—both based on standardized PARCC scores—to identify both Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) schools. This violates ESSA (Sec. 1111(c)(4)(B), (c)(4)(C), (c)(4)(D), and (d)(2)(A)) and the Protect Our Schools Act (§7-203(c)(2)(v) of the Education Article).

ESSA requires that the identification of schools for comprehensive support and improvement be "based on the system of meaningful differentiation described in subparagraph (C)" (Sec. 1111(c)(4)(D)). Subparagraph (C) says that the state must "Establish a system of meaningfully differentiating, on an annual basis, all public schools in the State, which shall (i) be based on all indicators in the State's accountability system under subparagraph (B)" (Sec. 1111(c)(4)(C)). Subparagraph (B) includes all academic and non-academic (school quality) indicators (Sec. 1111(c)(4)(B)). This is how ESSA requires states to use all indicators in their accountability systems to identify the bottom 5% of Title I schools.

ESSA requires the same use of all indicators in meaningful differentiation for the identification of targeted support and improvement schools: "Targeted support and improvement -- Each State educational agency receiving funds under this part shall, using the meaningful differentiation of schools described in subsection (c)(4)(C)— (i) notify each local education agency in the State of any school served by the local educational agency in which any subgroup of students is consistently underperforming, as described in subsection (c)(4)(C)(iii)…" (Sec. 1111(d)(2)(A)). Therefore, it is a direct violation of ESSA to only use some of the state's indicators to identify TSI schools.

This is backed up in state law. Similarly, §7-203(c)(2)(v) of the Education Article explicitly requires that a composite score that provides for meaningful differentiation include both academic and school quality indicators. As stated above, federal law requires states to use this system of meaningful differentiation to identify CSI and TSI schools, including "at the discretion of the State, additional statewide categories of schools" (Sec. 1111(c)(4)(C)(ii)). This includes the state's proposed bottom 5% of all schools category not required by ESSA.

To limit the identification of CSI and TSI schools to a single assessment is not only a violation of federal and state law, but it is far too narrow of a dataset to accurately determine the schools that need the most

urgent support and improvement. We saw during the years of No Child Left Behind that basing accountability on standardized test scores alone can drive attention and resources to shortcut methods like test prep instead of the real supports that address the root causes of low student achievement. That is why we are excited to see schools held accountable based on chronic absenteeism, school climate, and access to a well-rounded education. These additional data points of school success give us more holistic look at whether a school is providing the quality of education our kids deserve. We urge you to comply with federal and state law, and identify CSI and TSI schools based on all indicators that make up the composite score in our accountability system.

[For additional information for the previous three sections, please see Appendix and attached letter from Disability Rights Maryland]

Teacher Preparation
The Plan notes that MSDE will assure that teacher preparation programs "address the needs of a vastly diverse population." However, the Plan does not address a persistent problem that has been, at least in part, responsible for the significant achievement gap between students with and without disabilities: the inadequate preparation of teachers to meet the needs of students with disabilities in their classrooms. The Plan should include specific strategies for closing the gap between general and special education teacher preparation to ensure that all teachers are better able to understand and meet the needs of their students.

Community School Strategy
Throughout the Plan, there is no explicit reference to the Community School strategy as a key tool in ensuring students living in areas of concentrated poverty are supported. Title IV, Parts A and B of the Plan address student supports and practical approaches to OST programming, but do not touch on the ways that Community Schools support these approaches. Additionally, in *Appendix E: Maryland's Family Engagement Plan*, there is no mention of Community Schools and the variety of family engagement strategies being employed by Community Schools across Maryland. This strategy is supported with empirical research, including a recent study that highlights Community Schools as an effective component for ESSA implementation plans.[1]

In a Community School, community-based lead agencies are tasked with hiring a Community School Coordinator, and supporting at least one out-of-school time (OST) program. This coordinator then works in the school and surrounding community to manage and lead the work critical to the success of that Community School. The Community School strategy works to address the impacts of student-level concentrated poverty by impacting student attendance.[2] Research conducted by the Baltimore Education Research Consortium (BERC) found that Community Schools operating for at least five years have shown significant gains in attendance and reductions in chronic absenteeism. For example, BERC found that average daily attendance among Pre-K to 5th grade students has risen between 2009 and 2014 in Community Schools, while remaining flat or declining in most non-Community Schools.[3] Rates of chronic absenteeism have also declined significantly in Community School middle schools during that same period, while remaining virtually flat in non-Community Schools.[4]

[1] Oakes, J., Maier, A., & Daniel, J. *Community Schools: An Evidence-Based Strategy for Equitable School Improvement.* National Education Policy Center and the Learning Policy Institute (July 2017).
https://learningpolicyinstitute.org/sites/default/files/product-files/Community_Schools_Evidence_Based_Strategy_BRIEF.pdf
[2] Wool, S., Fermanich, M. and Reichardt, R. (2015). The Effects of Concentrations of Poverty on School Performance and School Resource Needs: A Literature Review. Denver, CO: APA Consulting
[3] Baltimore Education Research Consortium. (2013). A First Look at Community Schools in Baltimore. Retrieved from familyleague.org: http://familyleague.org/wp-content/uploads/2015/08/CommunitySchoolsReportDec2014.pdf
[4] *Ibid.*

In addition to these outcomes, Community Schools have shown increases in parent engagement - Baltimore's 45 Community Schools have recorded over 140,000 parent volunteer hours; reductions in suspensions and negative behaviors; and sustained academic outcomes for students both in Community Schools as well as in OST programs.[5] Across the state's Community School network, we see strategies in place that address chronic absenteeism, family engagement, out-of-school time learning opportunities, school climate, integrated health and social supports, and authentic community and family engagement. We believe there is a need for the State of Maryland to provide support to expand the Community School strategy through full implementation in schools serving students who live in concentrated poverty.

<u>Continued Stakeholder Engagement</u>
We want to thank MSDE for including stakeholders in this process. We appreciate the work of MSDE staff in compiling this Plan and for allowing stakeholders to participate in workgroups, arrange meetings with staff, and submit written comments. Stakeholder engagement should be considerate of the different language and accessibility needs of the students and families served by schools in Maryland. While surveys can be very useful to gather feedback, if they are not administered through a form or space that is familiar to parents/guardians and students, the feedback will be limited to those that know about the survey, speak English, or have access to a computer/smartphone. An expectation of proper ESSA implementation is that stakeholders in particular parents feel included in the ensuring that the plan is designed and implemented properly. It is essential for the success of our Plan to be as inclusive as possible to all stakeholders. We hope that stakeholder input will continue to be solicited as this Plan is implemented and that continued feedback will be welcomed and incorporated.

Thank you for this opportunity to contribute feedback to Maryland's Plan. Please see the appendix and attached memos that describe these recommendations in greater detail. We would be happy to speak with you should you require clarification.

Sincerely,

Maryland Education Equity Coalition:

- ❖ ACLU of Maryland
- ❖ Advocates for Children and Youth
- ❖ Attendance Works
- ❖ Baltimore Education Research Consortium
- ❖ CASA
- ❖ Disability Rights Maryland
- ❖ Family League
- ❖ Greater Baltimore Urban League
- ❖ League of Women Voters of Maryland
- ❖ Maryland Education Coalition
- ❖ Maryland PTA
- ❖ MOST Network
- ❖ Parent Advocacy Consortium
- ❖ Public Justice Center
- ❖ Ready at Five

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[5] *Ibid.*

CC:

Dr. Karen Salmon
Maryland State Superintendent of Schools

Senator Carter-Conway, Chair
Education, Health & Environmental Affairs Committee

Senator Paul Pinsky, Chair, Education Subcommittee
Education, Health & Environmental Affairs Committee

Delegate Anne Kaiser, Chair
House Ways and Means Committee

Delegate Eric Luedke, Chair, Education Subcommittee
House Ways and Means Committee

Dr. Chester Finn, Jr.
Vice President, Maryland State Board of Education

Dr. Michele Jenkins Guyton, Member
Maryland State Board of Education

Dr. Justin Hartings
Member, Maryland State Board of Education

Ms. Stephanie Iszard, M.Ed.
Member, Maryland State Board of Education

Dr. Rose Maria Li
Member, Maryland State Board of Education

Mr. Michael Phillips
Member, Maryland State Board of Education

Mr. Kyle Smith
Member, Maryland State Board of Education

Dr. David Steiner
Member, Maryland State Board of Education

APPENDIX

Disability Rights Maryland

The identification of targeted and comprehensive schools should not be based solely on academic achievement. Nonacademic factors play a significant role in the ability of students to progress academically and also have an impact on the equity issues that are of concern to so many inside and outside of state government. The interplay between all of these factors must be recognized, and necessary support must be provided to schools; focusing on academic achievement alone will not close the achievement and equity gaps.

ESSA requires states to define "students with the most significant cognitive disabilities." It is important that Maryland adopt a definition in accord with the federal parameters, including a connection to grade-level academic content standards, and ensuring policies regarding strategies and accommodations so that the 1% limit on students taking the alternate assessment is not exceeded.

In the section on Title I, Part D (Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk), there is no mention of students with disabilities, despite the fact that a significant percentage of students served in these categories have disabilities. The Maryland ESSA plan should include specific strategies for how Maryland will ensure that students in juvenile justice facilities will be provided with needed special education, related services and accommodations, as well as how Child Find will be implemented.

P. 37-38: School conditions: The plan continues to be deficient in its strategies for reducing the use of aversive behavioral interventions that compromise student health and safety. During the 2013-14 school year alone, for example, the data submitted to the United States Office for Civil Rights, which does not include all 24 Maryland jurisdictions, reflects 5061 incidents of restraint and 3225 instances of seclusion, the vast majority of which involved students with disabilities. This is unacceptable, and Maryland cannot simply "continue", as the plan proposes, to provide technical assistance and to implement the same activities currently underway. Restraint and seclusion are invasive practices that cause emotional trauma and can cause physical injuries or even death. MSDE must develop a more robust plan for addressing these aversive practices.

The first draft of the ESSA plan included a commitment to compile an annual statewide "watch list" of schools getting close to being identified for comprehensive school improvement status. This provision is not included in the current draft. DRM strongly urges MSDE to reinstate this commitment; by the time a school reaches CSI status, the school is in very difficult straits; it is critical that MSDE intervene at an earlier point to try to avoid having a school reach that crisis point.

In the section on Title I, Part D (Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk), there is no mention of students with disabilities, despite the fact that a significant percentage of students served in these categories have disabilities. The Maryland ESSA plan should include specific strategies for how Maryland will ensure that students in juvenile justice facilities will be provided with needed special education, related services and accommodations, as well as how Child Find will be implemented.

<u>Ready at 5</u>

❖ P38, School Conditions.
- o Combine bullets 2 and 5 as they are repetitive.
- o Add reference actions to be taken regarding the passage in the MD legislature of HB 425/SB 651 Public Schools -Suspensions and Expulsion, which prohibits the suspension or expulsion of prekindergarten, kindergarten, first grade, or second grade students from public schools with specified exceptions for an expulsion required by federal law or a suspension for not more than five school days under specified circumstances. Actions include, but are not limited to, addressing the law's requirements of schools to provide certain supports to address the student's behavior; the school system to remedy the impact of the student's behavior through certain intervention methods; and the State Department of Education to adopt certain regulations on or before a certain date. http://mgaleg.maryland.gov/webmga/frmMain.aspx?id=sb0651&stab=01&pid=billpage&tab=subject3&ys=2017RS
- o Include how the state will make public data on suspensions/expulsions and chronic absenteeism, and strategies to address disparities and disproportionalities.
- o Include a discussion about recognizing and addressing teacher and administrator implicit bias towards students and families.

❖ P39-41, School Transitions.
- o Include how the State will support and hold LEAs accountable for the requirement in ESSA (ESEA section 1119) for any LEA that receives Title I funds to develop agreements with Head Start programs, and, if feasible, other early learning programs that serve children who will attend the LEA (regardless of whether the LEA uses Title I funds to operate an early education program) to coordinate services, such as data reporting and sharing, alignment of standards and curricula, and transition activities for children moving from early education programs into public school programs. Transition activities include—
  - ▪ Developing and implementing a systematic procedure for receiving records of preschool children
  - ▪ Establishing channels of communication between school staff and their counterparts to facilitate coordination
  - ▪ Conducting meetings involving parents, kindergarten or elementary school teachers, and Head Start teachers to discuss the developmental and other needs of children
  - ▪ Organizing and participating in joint transition-related training of school, Head Start, and where appropriate, other early childhood education program staff
  - ▪ Linking the educational services provided by the LEA with those provided by Head Start agencies
- o Include in the discussion of the "transition resource guide" information on how the state will support the development of the above agreements and how the state will support a preschool through 3rd grade aligned and coordinated system.
- o Include the work of the Maryland Family Engagement Coalition

❖ P47-54, Title II, Part A,
- o P47., Use of Funds.
  - ▪ Include in the third bullet on building leadership capacity on the school level, to include building leadership capacity to implement an aligned and coordinated Preschool through 3rd grade system.
- o P50., Improving the skills of educators.

- Include how the State will support opportunities for principals, other school leaders, teachers, paraprofessionals, early childhood education program directors, and other early childhood education program providers to participate in joint efforts to address the transition to elementary school, including issues related to school readiness (ESEA section 2101(c)(4)(B)(xvi))
- Include how the State will encourage and support LEAs to provide joint professional learning and planned activities designed to increase the ability of principals or other school leaders to support teachers, teacher leaders, early childhood educators, and other professionals to meet the needs of students through age 8 (ESEA section 2103(b)(3)(G))
- Include how the State will encourage and support LEAs to increase teachers', principals', or other school leaders' knowledge base regarding instruction in the early grades and strategies to measure whether young children are progressing (ESEA section 2103(b)(3)(G))
- Include how the State will Provide LEA training to support the identification of students who are gifted and talented, and implementing instructional practices that support the education of such students, including early entrance to kindergarten (ESEA section 2103(b)(3)(J))