

August 8, 2017

Dr. Andrew Smarick  
President  
Maryland State Board of Education  
200 West Baltimore St.  
Baltimore, MD 21201

Dear Dr. Smarick,

As the former Maryland State Superintendent of Schools, I would like to thank you and the staff of MSDE for their work on the draft of the new ESSA plan. I know that there is much to consider when working with accountability systems and I appreciate all of your efforts. I am certain that you will be receiving numerous comments from constituent groups. I am also grateful for the opportunity to provide my comments, in hopes that the plan can be improved even further. While I think the plan is a good start, I believe it can and should be even better.

First, I have always been a staunch supporter of high standards for ALL students, and applaud the ambitious goals in the ESSA draft plan. However, I am concerned with the protracted and, many would argue, inadequate goal of reducing the number of non-proficient students by half by the year 2030. We know that there are student groups in our schools that are under-performing, some to an alarming degree, and this has been a persistent issue for some time. We should not be satisfied to take 12 more years to help only half of those students reach proficiency. We cannot be satisfied to watch another generation of students fail. I propose you provide whatever strong incentives schools require to address the needs of these students immediately.

The focus of my comments is the model used to represent school progress. It is always difficult to craft performance measures that are meaningful for all populations of students. A major limitation of the No Child Left Behind Act was its sole emphasis on standards-based targets for meeting proficiency standards. This focus resulted in resources being devoted mainly to students performing below proficiency. Swinging the pendulum too far to the other extreme, by using a growth model alone, could prove beneficial to students performing at or above proficiency, but could hurt struggling students by allowing teachers to be satisfied with "sufficient improvement", while masking performance well below standards. This is a particularly slippery slope for all of our more challenged student groups, Dr. Andrew Smarick as they need to demonstrate accelerated and significant growth toward proficiency. Adopting a growth model alone, without incorporating a standards-based target is a way to ensure that achievement gaps continue to persist. Fortunately, the PARCC assessment can be utilized for both purposes.

There is yet another group of students in Maryland public schools I wish to bring to your attention. For many years, Maryland schools have neglected, undervalued and failed to develop the potential of above average students. The addition of student growth for all students would help to bring them back into focus, but their achievement also needs to be valued in any good

accountability system. Achievement measures such as SAT, AP, and other college readiness assessments should be added to the ESSA school progress model to provide valid assessment options for students on the higher ends of achievement. Schools should be encouraged to value and further develop their high achieving students, as well as accelerating the lower achieving students. A good variety of school performance indicators is essential to a fair and valid rating for every school.

Another concern I have is with the use of the five-star rating. It is an inadequate substitute for an A-F grading system, which has too many current, yet unrelated, connotations to provide meaningful descriptions of school performance. To that end, I recommend using performance level indicators like those used with assessments. These have proven to assist parents to make valid interpretations of their students' test results, and could be used similarly to assist parents to make valid interpretations concerning school performance.

I also believe that the Board should explore ways to allow individual schools to highlight and celebrate the special successes they have with innovative programs and initiatives. We will never truly improve schools until we also value innovation and risk-taking that benefits students. Of course, these programs must be proven effective before they should be presented along with a school's rating.

I am sure the other stakeholders will provide even more ideas to improve the ESSA accountability plan, all from different points of view. I encourage you to evaluate these comments by considering what is best for the students as your lens. You need to carefully consider the unintended consequences of adopting various accountability measures to ensure your plan has the intended impact on student and school performance.

Thank you again for the opportunity to weigh in on this important policy which will impact Maryland's public school students for years to come. If you wish to discuss any of my comments further, I will be happy to talk with you.

Sincerely,

Nancy S. Grasmick  
Presidential Scholar

C: Karen B. Salmon, Maryland State Superintendent of Schools  
Maryland State Board of Education Members