

Good afternoon Mary,

As you might expect Attendance Works has been reviewing the State's most recent iteration of the state ESSA plan with great interest. While we are in the midst of preparing our written comments we wanted to reach out to you and flag some language that concerned us. The plan currently states, on page 26, that "most" MD schools have chronic absence rates of less than 10%. However, when we looked at the publicly available data for the 2015-2016 school year we found that is not the case.

Here is the breakdown:

- 504 schools with less than 5% (30% of all schools)
- 487 schools with a range of 5.1% - 9.9% chronic absence (30% of all schools)
- 645 schools with a range of chronic absence 10% - 94.9% (39% of all schools)
- 2 schools with greater than 95% chronic absence (.001% of all schools)
- 22 schools with no data (1% of all schools)

1,660 schools in total

Based on our calculations at least 40% of Maryland schools have a chronic absence rate that is 10% or greater (meaning that one out of 10 of their students are off-track to academic success). Additionally this data does not include kindergarten chronic absence which is generally higher than the other elementary grades and also excludes students who are not enrolled at a school for at least 90 days. Therefore it is likely that the 2015-2016 data under reports the chronic absence rate by school.

We would recommend that the language about "most" schools not having a 10% or more chronic absence rate be struck from the ESSA plan. Additionally we believe that given the relationship between chronic absenteeism and student outcomes especially for our most vulnerable populations that the rules for calculating chronic absence should be amended to include kindergarten and have a more narrow window for exclusion such as enrolled for at least 10 days as Connecticut and many other states have done.

Additionally we want to flag for you the use of the language "persistent attendance" as the inverse of chronic absence. We know from research that students need to attend at least 95% of the time to be on track academically. The delta between persistent or regular attendance is considered at-risk attendance (students who attend 91% - 94% of the time). Research has shown that students who are in the at-risk category also suffer academic impact. Chronic absence is not a cliff but rather an important stopping point or early warning indicator that has much clearer ramifications for student outcomes. We think it is risky to suggest that anything greater than 90% attendance is persistent, when in fact it isn't until we get to 95% attendance (or a student missing 9 or fewer days in a school year) that they are more likely to be on track academically. We don't want to send the wrong message that schools with a high number of at-risk students are doing fine as long as their students aren't chronically absent. It also miscommunicates the goal which should be that all students attend at least 95% of the time.

We will follow up with additional thoughts formally on each of these topics and others but we wanted to get this analysis to you ASAP.

We would also be interested in better understanding how chronic absence will be used in the accountability system and in particular how points will be assigned. We will follow up with a formal request in that regard as well.

If you have any questions about the points we are raising here feel free to reach out.

In partnership.

Sincerely,
Sue Fothergill

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Associate Director of Policy
Attendance Works
www.attendanceworks.org
[410-404-4570](tel:410-404-4570)