TO: Members of the State Board of Education

FROM: Karen B. Salmon, Ph.D.

DATE: August 22, 2017

SUBJECT: Every Student Succeeds Act (ESSA) Update

PURPOSE:

To provide an update on the feedback the Maryland State Department of Education (MSDE) has received on Maryland's Draft Every Student Succeeds Act (ESSA) Consolidated State Plan and to address the major areas of feedback.

BACKGROUND/HISTORICAL PERSPECTIVE:

The MSDE published the second draft of the ESSA Consolidated State Plan for comment on June 29, 2017. The draft, accompanying survey, and an overview was available for public comment through August 10, 2017. A Spanish translation of the overview was also posted on the website. Copies of the Plan and overview were provided to Governor Larry Hogan, the Legislative Policy Committee of the General Assembly, and the Kirwin Commission. Feedback from this outreach is being provided to the State Board for discussion and final decisions at the August 22, 2017 meeting. The final Plan will be submitted to the U.S. Department of Education on or before September 18, 2017.

EXECUTIVE SUMMARY:

More than 445 individuals responded to the survey representing all 24 local school systems in Maryland. Letters or emails were received from 36 individuals representing educational and/or equity organizations, superintendents, Boards of Education, parents, educators and other groups. Letters are posted on Maryland's ESSA website.

ACTION:

Information and action on Maryland's Consolidated State Plan.

Analysis of Feedback for Maryland's Draft Consolidated ESSA Plan – August 2017

Name/Affiliation	Concerns	MSDE Position
Governor, Legislative Policy, Attorney General, Legislators, Commissions		
Larry Hogan Governor	1. There needs to be equity and access to the best possible education for all Maryland children because every child deserves the ability to receive a world-class education, regardless of where they happen to live. The three focus areas are: school accountability, identification of and intervention in failing schools, and innovation.	1. The Maryland Plan has attempted to meet the Governor's goal and address the focus areas through the development of Maryland's accountability system, supports to the lowest performing schools, and a strong approach to supports and strategies.
President Thomas V. Mike. Miller, Jr. Speaker Michael E. Busch Legislative Policy Committee	1. While the five-star system is not a "letter-grade model" and thus compiles with Chapter 29 [of the Protect Our Schools Act], it may raise similar labeling concerns.* 2. It is unclear if the percentile calculations and indicator scores will be reported on the school's dashboards or report cards. Unclear what information will be reported to parents. 3. Additional information is needed on the calculation of the equity gap. 4. MSDE does not define any of the actual scales or rules for distribution of points that will be used. 5. The metric for measuring school climate and the survey instrument have not yet been identified. 6. Maryland's plan is silent on how often	1. The state is considering a four- or six-category system, and will also create descriptors and descriptions for each of the ratings, involving stakeholders, to ensure clear communication about the meaning of each category. 2. All information used to determine the summative category will be available. This includes performance on each indicator (all students and student groups), cumulative performance, and percentile rank in addition to summative category. The MSDE is committed to engaging stakeholders in determining how best to report information on the Maryland Report Card. The full array of reported information will available at the culmination of the report card development process. 3. Maryland is currently studying the appropriate "rule" to ensure that a school with significant equity gaps will be re-classified to a lower category. 4. Measures will be assigned points using the

*Items in red will be addressed with the State Board at the August 22, 2017 State Board meeting or language has been added to the State Plan.

	MSDE or the local board will monitor and review both the CSI and TSI plans. 7. Identifying CSI and TSI schools using only academic achievement and academic progress may not be consistent with the legislative intent of Chapter 29. 8. Distributing funds based on meeting established benchmarks and accountability measures is not based on a formula or driven by the school's needs. 9. Strategies and interventions for low performing schools may not be construed to authorize the State Board to implement a specific intervention strategy until after a three-year period from the plan's implementation. 10. Maryland's plan does not include a method for exclusively comparing schools with similar demographic proportions. 11. Using participation to identify TSI schools will result in a potential over-identification of such schools.	preliminary system described in the ESSA plan. Scales used to assign points (as opposed to assigning points as a percent of a whole) will be determined by the distribution of raw scores, research, or a standard-setting method. MSDE is currently studying the assignment system for all indicators and measures to ensure that it is clear, meaningful, and provides differentiation among schools. 5. The MSDE is collaborating with the Regional Educational Laboratory and Mathematica to develop a state-wide survey that is statistically valid, reliable, and can be used for accountability purposes. 6. TSI and CSI plans will be reviewed annually by the MSDE. Monitoring of TSI action plans: Local school systems are responsible for monitoring action plans for schools identified for targeted support and improvement. As a result, the frequency of monitoring visits will be determined at the local level. The MSDE will provide resources and technical assistance, as necessary, to support school systems in monitoring school improvement. Monitoring of CSI action plans: Schools identified for comprehensive support and improvement will participate in quarterly monitoring from the MSDE. 7. MSDE will review the criteria with the State Board. 8. Distribution of funds will be based on a formula and driven by identified needs in the approved needs assessment and action plan. Schools will be held accountable for meeting established benchmarks and accountability measures in approved plans. 9. The MSDE will provide technical assistance to support school improvement. The ESSA plan describes the technical assistance that will be provided by MSDE to support school improvement. 10. The MSDE is currently studying a variety of

		methodologies such that schools can be compared to similar schools in a meaningful, statistically valid way. This will be reported, in compliance with the Protect Our Schools Act. (Because ESSA requires a uniform accountability system throughout the state we cannot categorize schools for accountability purposes according to varying subsets of schools.) 11. MSDE is considering removing participation from the identification of TSI schools and integrating it into the overall classification system.
Adam D. Snyder Chief Counsel, Opinions & Advice Office of the Attorney General	1. The State Board must consider the same mix of academic and non-academic factors throughout the school accountability process, from developing the accountability system, to calculating the composite score, to identifying low-performing schools, and, ultimately, to the local boards' development of improvement plans for the low-performing schools.	1. Criteria and feedback has been shared with the State Board. Item identified for discussion.
Senator Jim Rosapepe MD State Senate	1. Reduce the High School graduation rate standard to 5% 2. Divide the "other academic indicator" into two categories of 10% each (one college prep and one skills prep). 3. Consider increasing the standard for dual enrollment, perhaps passing more than one course	1. The Protect our Schools Act requires that every indicator be at least 10% 2. To increase the other academic indicator from a total of 10% to a total of 20% would require decreasing the weights of the remaining academic indicators, pushing them below the 10% threshold set by the Protect our Schools Act 3. The MSDE will review data as the accountability system is implemented.
William E. Kirwan Commission on Innovation and Excellence in Education	1. Set ambitious yet realistic goals	1. A study of Maryland data indicates that this goal results in annual measurements of interim progress that are ambitious and attainable, both of which were prioritized by our stakeholders and state board.

Organizations/Representatives or Member of Organizations

Teach Plus Michael Meadows/Laurent Rigal (Comments were on Draft 1-Concerns noted here still applied to Draft 2)	1. Move the proficiency in science indicator to academic achievement instead of academic progress 2. Add world languages, health, and IB Primary years program as part of the elementary school well-rounded curriculum 3. Use the "Five Essentials Survey" 4. When defining chronic absenteeism, consider excused and unexcused in the count and accommodate for medically fragile	1. This is not allowed under the Every Student Succeeds Act (ESSA)- please see ESSA 1111(c)(4)(B)(i)(I) 2. The ESSA State Plan reflects feedback from stakeholders 3. This survey is one of several that we are investigating. The Maryland State Department of Education (MSDE) is collaborating with the Regional Educational Laboratory and Mathematica to develop a survey that is statistically valid, reliable, and can be used for accountability purposes. 4. The MSDE is currently working on aligning state and federal reporting requirements
The Advocacy Institute/ National Down Syndrome Congress Candace Cortiella/ Ricki Sabia	1. Strongly encourage MD to add a section on stakeholder engagement 2. Language on Universal Design of Learning was removed 3. The MD plan should list the strategies the State will employ to not exceed the 1% cap on alternate assessments 4. Should create a process for stakeholder engagement in developing the definition of students with the most cognitive disabilities 5. Add Economically Disadvantaged Students, Students with Disabilities, and English Learners to the student groups listed on page 9 6. Compare n-size of 5 to an n-size of 10 7. Discuss impact of n-size of 10 on graduation rate 8. Determine the exclusion impact on student groups 9. Respond to how the State collaborated with stakeholders to determine the n size	1. This language has been added to the ESSA State Plan. 2. This language has been added to the ESSA State Plan. 3. This is not a requirement of the ESSA State Plan. 4. Academic deficits or difficulties alone do not indicate that a student has a significant cognitive disability. Therefore, there is no fixed definition. 5. This information is provided in question 4(i)(b) 6. The MSDE has doubled the N-size used for accountability from 5 to 10. An N-size of 10 will align the reporting and accountability N-size to provide greater transparency of all reporting. 7. Graduation Rate n-size remains at 30. This has been added to the ESSA State Plan. 8. This information is provided in question 4(ii)(b) 9. This has been added to the ESSA State Plan. 10. The ESSA State Plan reflects feedback from stakeholders for rigorous, ambitious and realistic goals. The goals are the same for all student groups- to cut the non-proficient rate in half by 2030 11. The MSDE is committed to engaging stakeholders in 2020 to determine graduation goals. 12. This is not accurate- the USED has allowed other states to use an index.

		10. The long term goal for students with disabilities is not ambitious enough	13. SGP is a widely used methodology for describing student growth at the school level. The MSDE is investigating growth to standard for inclusion.
		11. Graduation Goals should be the same long term goals for all student groups and not be reset	14. The MSDE does not interpret ESSA this way. The progress measures included in the ESSA State Plan as written comply with both ESSA and the Protect our Schools Act (State law).
		12. MD must base the academic indicator on grade-level proficiency on State assessments (proficiency is the only measure permitted by the ESSA for Academic Achievement indicator- using an index based on average scores cannot be used)	15. Course completion is based on assessments; therefore it cannot be included in the School Quality School Success measure as per State law. The inclusion of this measure complies with the Protect our Schools Act (State law).
		13. Use of SGP is highly questionable- State should use growth to standard in lieu of SGP	16. The MSDE does not interpret ESSA this way. Please see question 4(iv)(b) in the ESSA State Plan. The readiness for post-secondary success indicator is an academic measure in compliance with the Protect our Schools Act (State law) which states no indicators that rely on assessments or credit can be in SQSS.
		14. ESSA is clear that a state may either use a measure of student growth OR another valid and reliable statewide measure- MD is using both	17. Maryland stakeholders have indicated clear support for this measure. The MSDE is watching Massachusetts' plan to see if this is allowable.
		15. The use of course completion in fine arts and physical education for 5th graders should not be part of an academic indicator	18. The MSDE is collaborating with the Regional Educational Laboratory and Mathematica to develop a survey that is statistically valid, reliable, and can be used for accountability purposes.
		16. MD does not provide for an "other academic indicator" for high schools and readiness for postsecondary success should be in SQSS	19. ESSA gives flexibility to States. The MSDE may not put any academically derived measures in SQSS due to the Protect our Schools Act (State law)
		17. Graduation Rate- MD may not use 5-year plus rate as ESSA defines the 4 year and 5 year rates	20. A school or LEA category determination based on the 'all students' will be adjusted based on the number and size of the equity gaps. For example, a school that would otherwise merit four stars based on 'all students' could be adjusted to a three-star school. Maryland is currently studying the appropriate "rule" to ensure that a school with significant equity gaps will be re-classified to a lower category.
		18. Concerned about measures like school climate surveys as a measure because of issues of validity with results	
		19. MD needs to move several measures proposed under other Academic indicators to SQSS to comply with ESSA	

20. There is insufficient information about how the equity gap impacts the final rating, concerned that MD is not including student group performance in a meaningful way	21. The MSDE ESSA State Plan as written complies with ESSA and the Protect our Schools Act (State law).
21. Concerns about weights because removing indicators from Academic and making SQSS	22. The State Board has determined that only academic achievement and academic progress will be used to identify CSI schools. The State Board will receive all recommendations for identification.
22. English Language Proficiency (ELP) should be included in the definition of identifying schools for Comprehensive Support and Improvement (CSI)	23. The MSDE will be analyzing and sharing the data results on the composite summary which will include schools within 5-10 percentage points of the lowest 5 percent of schools. All schools will have accountability data which will be available on the website.
23. Believes MD should still have a watch list of schools as identifying schools every three years is too long	24. The State Board will receive input on their recommendations for identification.
24. Identification of Targets Support and Improvement (TSI) schools should include ELP and Graduation Rates	25. The State Board will receive input on their recommendations for identification
25. Identification of TSI schools based on low performing subgroups should also include ELP and graduation rates	26. Information on participation will be reported on an annual basis per page 25 of the ESSA State Plan. All goals and targets will be factored into the accountability system as schools are differentiated into categories.
26. Failure to meet the 95% participation rate for even one year should be factored into the accountability system	27. The MSDE will discuss with LEAs a measure of trajectory growth and a sustainability plan as part of the requirements for exiting TSI schools.
27. MD should provide a more specific amount of progress needed to exit TSI	28. The MSDE added language to ESSA Plan.
28. MD should include a discussion of inclusive best practices to specifically improve school conditions for students with disabilities	29. As a condition for funding of the four LEAs and two state agencies who receive Title I, Part D funding, subgrantees are required to describe in their grant application how the facilities will provide assurance to work with children and youth with disabilities in order to meet an existing individualized education plan/program and an assurance that the agency will notify the child's or youth's local school if the child or youth is identified as in need of special education services while in a correctional facility or institution and intends to return to the local school. The grant
29. MD should state specifically how it will ensure that students with disabilities in facilities for Youth who are neglected, delinquent or at-risk are provided with special education and related services as needed	

	30. MD should build up the supporting effective instruction (Title II) section with specific initiatives to address the skills needed to support effective instruction for all students and include students with disabilities 31. MD should address UDL and inclusive education in Title IV, Part A- should describe an initiative to improve access to a quality education in the general education classroom 32. MD should mention collaboration with the State Systemic Improvement Plan for students with disabilities	applications are reviewed and approved by peer reviewers. 30. Language will be added regarding students with disabilities. The specific initiatives are going to be determined based upon a needs assessment in the local school systems as well as feedback from LEA assistant superintendents of instruction, professional learning supervisors, and content supervisors. 31. LEAs will determine how to use these funds- it is beyond the purview of the State to direct the usage of these funds- all allowable expenses (as laid out in the law) will be approved by the State. 32. This has been added to the Plan.
Attendance Works Sue Fothergill	1. Strike language about "most" schools not having a 10 percent or more chronic absenteeism rate 2. Rules for calculating chronic absenteeism should include kindergarten students 3. Rules for calculating chronic absenteeism should have a more narrow window of exclusion such as enrolled for at least 10 days 4. Do not use the term "persistent attendance"- anything less than 90 percent is "at-risk attendance"	1. The language has been edited 2. Maryland includes kindergarten students in this count 3. The MSDE is currently working on aligning state and federal reporting requirements 4. The MSDE will use research on the impact of attendance when setting the standards to assign points to chronic absenteeism
Maryland State Education Association (MSEA) Betty Weller	1. All indicators in the accountability system—including all school quality indicators—should be used with their determined weighting to identify bottom performing CSI schools and all TSI schools 2. Schools should not receive a symbol score—including stars—in addition to their composite percentile score. 3. Funding for all CSI schools—including	1. Suggestions for identification of CSI and TSI schools will be shared with the State Board. 2. This system provides additional information to parents 3. Funding will be based on Title I and the needs assessment. 4. The Department has a role in support of CSI schools. 5. This has been added to the Plan 6. A preliminary system for assigning points is laid out in the ESSA plan. The system will ensure that each

those under more rigorous state intervention— should be based on a formula and driven by the identified needs of each school

4. All mandates on CSI schools during the first three years of their improvement plans—except those found in ESSA— should be removed from the state plan.

5. Representatives of bargaining units should be directly included as stakeholders for feedback on CSI and TSI improvement plans

6. The methodology for determining performance on indicators should result in consistent and statistically valid differentiation between schools for all indicators.

7. The State plan should include long-term goals and annual measurable objectives for each indicator in the accountability system, including each school quality indicator.

8. The punitive equity measure should be removed from the state plan. The plan's details for targeted support and improvement address this issue more effectively.

9. The linking of test participation and TSI identification should be removed from the state plan. Reporting whether the school meets the federal requirement should provide enough accountability.

10. The State Plan should include several implementation requirements to ensure quality instruction from adjunct teachers

11. The State Plan should include language

indicator meaningfully differentiates among schools, as required in the ESSA legislation.

7. The MSDE ESSA State Plan as written complies with ESSA and the Protect our Schools Act (State law). The MSDE will study the new measures added to the accountability system, and work towards continuously improving the accountability system.

8. MSDE will carefully re-review the plan to ensure that it is compliance with ESSA. In addition, per CCSSO, "With the implementation of the Every Student Succeeds Act (ESSA), states have a new opportunity to lead on educational equity." While the performance of student groups on each indicator must be reported, per the ESSA legislation, the MSDE believes that more than reporting is necessary to close these gaps.

9. The ESSA state plan reflects feedback from stakeholders and complies with ESSA.   Per ESSA, states must have a method of factoring in the participation requirement of 95%.

10. The certification subcommittee of the Teacher Induction Retention Act workgroup is finalizing recommendations for the requirement of the adjunct certification, including the validity period, transferability, support of that instructor, and professional development requirements. As with all regulatory changes, these recommendations will be reviewed by PSTEB and the SBOE.

11. Current certification requirements for Administrators can be found in COMAR 13A.12.04.04. Currently, administrators are required to have 27 months of satisfactory teaching experience, experience on a professional certificate, or experience as a specialist.

12. In response to the Maryland State Induction, Retention, and Advancement Act of 2016, a Workgroup of stakeholders including MSEA members

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that requires all assistant principals and principals to have completed at least five years of teaching and received a rating of highly effective for a minimum of two of the most recent five years teaching. They should also have at least two years of experience in a role that involves instructional coaching (i.e. mentors).

12. The State Plan should include several improvements to the mentoring program, including how mentors are selected, trained, and compensated; who receives a mentor; the appropriate ratio of mentors to new educators; and, other details

13. The State Plan should make job imbedded professional development a priority and should establish a strategy for utilizing and overseeing micro-credentialing as a form of individualized professional learning.

14. The State Plan should include a general plan for student loan forgiveness and housing incentive programs for teachers.

15. It is unclear how stars will be assigned to schools

16. Five categories is essentially the same as A-F

17. The State Plan should make a commitment to direct Title IV funding to the expansion of full-service community schools in Maryland

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was formed. As a result of the recommendations of the Workgroup, two committees of stakeholders were formed to provide recommendations on induction and on mentoring. The report from the recommendations of the Workgroup and its Committees will be released in November. These recommendations will be used to revise the existing COMAR 13A.07.01 related to induction and mentoring

13. Job embedded professional development is a priority of the state that must be implemented on the local level. The state prioritizes this at quarterly state-wide meetings with induction coordinators and Title IIA directors. The online Maryland State Professional Learning Program was created for this purpose, as well as the purpose of allowing educators to be able to accrue points for job embedded activities that can lead to CPD credit. Language in ESSA will be revised to more clearly reflect this as a state priority. Currently, the state has a Continuing Professional Development Credits CPD options for those locals who offer micro-credentialing and job embedded professional development. The state will enhance the offerings of CPDs through local submissions of micro-credentials.(from DEE)

14. The incentive subcommittee of the Teacher Induction Retention Act work group is finalizing recommendations regarding loan forgiveness and other potential incentive opportunities.

15. Once the total score is calculated, it will be given a percentile rank and category determination. The methodology for assigning the category is currently under study. Stakeholder feedback indicated the desire for a meaningful system under which only schools that truly meet Maryland's standards for excellence would be awarded the top category, and

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		schools in the lowest category unambiguously fail to meet those standards.
		16. The State Board has debated the use of 4, 5, or 6 stars
		17. LEAs will determine how to use these funds- it is beyond the purview of the State to direct the usage of these funds- all allowable expenses (as laid out in the law) will be approved by the State.
Title I Committee of Practitioners	1. Have an asterisk next to the star to note that equity gap was not met. This will help parents to better understand the rating. Equity gap counted as one star is too much weight on the final rating. 2. Communication (messaging) about school ratings will have to be very well thought out. 3. It will be good when parents, educators and the community see how a school compares to previous years in their report card evaluation. When a school demonstrates improvement each year or consistently high achievement for several years it will strengthen the view from parents, etc. that the school is on the right or good track. 4. The student growth measure has some issues, particularly around students who are already proficient. The issues seem most pronounced in middle school math. Suggestion would be to use the growth measure with caution for students already proficient or better. 5. Student growth targets show a lot of promise. Suggest looking at the DC model. 6. Non-academic measures are cited in both	1. The MSDE will engage stakeholders in creating descriptions for each of the ratings and develop meaningful criteria for each designation 2. The MSDE will work with stakeholders to develop strong communication and messaging. 3. Data from previous years will be available and easily accessible. 4. SGP is a widely used methodology for describing student growth at the school level. The MSDE is investigating growth to standard for inclusion. 5. SGP is a widely used methodology for describing student growth at the school level. The MSDE is investigating growth to standard for inclusion. 6. The MSDE is collaborating with the Regional Educational Laboratory and Mathematica to develop a state-wide survey that is statistically valid, reliable, and can be used for accountability purposes. Part of the development process will include input from LEAs, but the MSDE must ensure that administration of the accountability survey is uniform statewide.

	the comprehensive school support and in the Protect Our Schools legislation, but chronic absenteeism is a weak proxy for the non-academic measures. Recommend quality survey. There is some work being done on student efficacy which may prove promising.	
Jose Luis Barata Anne Arundel Community College- Coordinator of STEM Initiatives/member of the MSDE Gifted and Talented Advisory Council	1. MD should treat gifted and talented students as a historically underserved group and their performance measured, accordingly, in their progress rather than grade level placement.	1. MD is currently reporting on all groups required in ESSA. There is not a statewide common definition of gifted and talented students, and therefore including gifted students as a student group would result in an accountability system that was not statewide.
The Leadership Conference on Civil and Human Rights	Comments are inclusive of all the required elements of the State Plan. Maryland has included all required elements.	
Katherine Rigler MD Gifted and Talented Advisory Council	1. On –grade level PARCC Assessments are not adaptive and may not have a ceiling high enough to measure what a gt/advanced student knows 2. Scores of 4 or 5 on PARCC should be reported, disaggregated, and used separately as indicators of performance and academic growth 3. High achieving students should be a specific student group in the Maryland accountability system 4. Should set annual measurable objectives at the advanced level 5. Explicitly state that the professional training will be in sufficient depth to be meaningful and truly useful to educators seeking to identify those special needs (GT) students and require LEAs to report what that training is 6. Require LEAs to report specifically what collaboration the LEA has had with	1. The PARCC Consortium has placed deliberate attention to differentiation within the tested population. Typical assessment programs such as Maryland's historical program included only three performance levels (basic, Proficient, and advanced). PARCC is using five levels. PARCC Level 4 is tightly aligned with College Readiness and Level 5 is above college readiness. 2. We will report all levels disaggregated, and we will consider scores of 4 and 5 separately when calculating the performance index portion of the academic achievement indicator. 3. MD is currently reporting on all groups required in ESSA. There is not a statewide common definition of gifted and talented students, and therefore including gifted students as a student group would result in an accountability system that was not statewide. 4. ESSA requires states to "Describe the long-term goals for improved academic achievement, as measured by proficiency on the annual statewide reading/language arts and mathematics assessments." Our long-term

	internal and external stakeholder groups who interact with students with specific learning needs including GT students 7. 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 8. Clarify the eighth grade math exception so that it is clear that middle school students taking a "high school" course in the middle school will take the high school end-of-course assessment for the course in the year that they completed that high school course 9. MD should agree to explore using computer adaptive assessments for State assessments	goals, and associated annual measures of interim progress, are therefore based on proficiency, which is defined as PARCC level 4 or 5. 5. Gifted students who fall "in the margins" at the upper end of the cognitive spectrum are one of the major foci of course revisions for both elementary (2017) and secondary literacy (2016) within educator preparation programs. The 2017 revision of State standards for educator preparation programs in Maryland will also require teacher candidate competency in the Universal Design for Learning, designed specifically with gifted students in mind. 6. All LEA plans will include consultation as per the law 7. According to guidelines for Title I, all applications require LEAs to identify the use of funds based on allowable expenses 8. ESSA only addresses grade 8 9. Computer adaptive assessments are an efficient way of obtaining a particular score for a student on a particular standard. A criterion referenced assessment exposes students to all standards and better informs instruction
Ten LEA World Language Supervisors	1. Include world languages among "percentage of 8th grade students passing one each of coursework in mathematics, ELA, social studies, and science" in the Credit for Completion of a Well-rounded curriculum 2. Include achieving the Maryland Seal of Biliteracy in the Readiness for Postsecondary Success indicator 3. Include world language in the SQSS Indicator for middle schools- Access to a Well-rounded curriculum	1. The ESSA state plan reflects feedback from stakeholders and complies with ESSA and the Protect our Schools Act (State law). Research supports that academic achievement in middle school strongly predicts high school achievement. Middle school achievement includes not failing core courses (defined as we have). In addition, fine arts, physical education, and health are included in the "access to" measure. 2. The MSDE has recommended adding this measure 3. The MSDE will continue to explore courses for access to a well-rounded curriculum
Bertha Knight Chair-Maryland State	1. Disaggregate data for advanced/gifted learners as a student group	1. MD is currently reporting on all groups required in ESSA. There is not a statewide common definition of

Advisory Committee on Gifted and Talented Education; Director of Enrichment for Baltimore City Schools		gifted and talented students, and therefore including gifted students as a student group would result in an accountability system that was not statewide.
MD Coalition for Equity	1. Use descriptors to communicate school performance. 2. Use a system similar to Illinois, which assigns schools to categories using a combination of percentile rank and additional criteria in a 4 tier system. 3. The identification of TSI and CSI schools be determined based on all indicators in Maryland's accountability system. 4. How will the Department work with districts to empower parents and community members to be involved in school improvement and accountability?	1. The MSDE will create descriptors and descriptions for each of the ratings, involving stakeholders, to ensure clear communication about the meaning of each category. 2. The methodology for assigning the categories is currently under study, and will involve stakeholders. Stakeholder feedback indicated the desire for a meaningful system under which only schools that truly meet Maryland's standards for excellence would be awarded the top category, and schools in the lowest category unambiguously fail to meet those standards. 3. Criteria and feedback has been shared and with the State Board. Item identified for discussion. 4. The MSDE will continue to meet with the ESSA External Stakeholder Committee to seek input, will work with parents to seek input on the report card, and will continue to engage parents and community members in the implementation of Maryland's ESSA Plan.
Maryland Education Equity Coalition	1. Change chronic absenteeism measure to include students enrolled at a ten day minimum enrollment. 2. Remove "persistent attendance" language from the plan 3. Use school quality/student success measures to identify TSI and CSI schools 4. The plan is not clear as to how MSDE will ensure educational progress of those students not included in the accountability system.	1. The MSDE is currently working on aligning state and federal reporting requirement for chronic absenteeism. 2. The plan language will be modified 3. Criteria and feedback has been shared with the State Board. Item identified for discussion. 4. The accountability system is designed to provide feedback on the progress of all students and all student groups in all schools. Professional Development and strategies within the Plan and the LEA plans to be developed will provide support to all

5. SGP includes only students with two consecutive years of scores 6. Growth should be compared to similar students 7. Students already performing at higher rates grow at greater rates 8. Recommend a criterion-based growth measure that includes proficiency. 9. Include a mechanism to compare similar schools 10. Use all indicators to identify TSI and CSI schools 11. Recommend using Direct Certification for all children and schools in Maryland for FARMs 12. Restore language that details robust strategies for identifying homeless children and youth 13. Restore language that establishes minimum standards for training of LEA personnel on needs and rights of homeless children. 14. Require each LEA to designate a homeless education liaison. 15. Require public pre-K programs to coordinate with Child Find to identify and enroll homeless 4 year olds 16. Eliminate barriers to homeless students' participation in extracurricular and academic activities 17. Establish timelines for the provision of transportation. 18. Specify procedures for oversight of LEA activities for homeless 19. Provide assistance if a migratory student moves from on jurisdiction to another in	students. 5. SGP will continue to be studied as data is gathered. 6. The SGP methodology allows for a comparison of a student to his or her academic peers, without a pre-selection of demographic characteristics. (While it is likely that a student's academic peers are all demographically similar, the SGP methodology does not require a definition of "similarity" based on non-academic characteristics.) 7. The SGP methodology allows for a fair determination of "growth." High-achieving students are compared only to their academic peers, and thus if this group exhibits higher growth than low-achieving students, a single high-achieving student with "high" growth will actually have an SGP in the "typical" range compared to his peers. Low-achieving students are compared only to their academic peers, and thus if this group exhibits lower growth, a single low-achieving student with marked growth will actually have an SGP in the "high" range. 8. Beginning in 2017-18, Maryland will study a growth-to-standard measure for reporting and inclusion in the accountability system, in combination with student growth percentiles. The anticipated timeline for study and determination of feasibility is three years. 9. The MSDE is currently studying a variety of methodologies such that schools can be compared to similar schools in a meaningful, statistically valid way. This will be reported, in compliance with the Protect Our Schools Act. 10. Criteria and feedback has been shared with the State Board. Item identified for discussion. 11. MSDE and Maryland school systems follow guidance from the US Department of Education in determining which students are identified as low-income.

| | | the middle of assessment or IEP development | 12. MSDE condensed steps to provide an overview of the process that will be utilized to support LEAs in identification and assessment of children and youth experiencing homelessness by ensuring that LEA develops, reviews, and revises policies and procedures to eliminate barriers to enrollment. The MSDE still plans to continue to implement the steps to aid in the identification of students experiencing homelessness in Maryland. |

20. Support LEAs to develop agreements with Head Start programs and, if feasible, other early learning programs that serve children
21. Recommend building leadership capacity to implement aligned and coordinated Preschool through 3rd grade and support leaders and other staff to address transition to elementary school
22. Reflect recent legislation banning suspensions and expulsions of prekindergarten to second grade students. Include instructions for data collection and strategies to address disproportionality
23. Discipline section of the plan is too narrow.
24. MSDE should work with LEAs to end practices of informal suspensions.
25. Ensure that LEAs fully comply with COMAR to ensure that schools apply with fidelity the requirements that apply to students with disabilities who have IEPs or 504 plans.
26. 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
27. MSDE must develop a more robust plan for addressing aversive practices (restraint and seclusion)

13. MSDE will train or make provisions for training on recommended best practices for addressing specific needs, identification, and awareness of children and youth experiencing homelessness at statewide meetings, conferences, national trainings/conferences of student services staff, pupil personnel workers, administrators, school counselors, school social workers, school transportation staff, and special education teachers and/or MSDE Divisions.
14. The MSDE has a designated McKinney-Vento State Coordinator to facilitate the coordination of services to homeless students with LEAs and other State agencies. The Coordinator works in partnership with each designated LEA McKinney Vento liaison to support these efforts. The MSDE has established a Homeless State Advisory Committee comprised of State and local community partners who meets regularly to identify gaps in services and trends within this population of students, and to review all relevant information, regulations, laws, and policies affecting homeless students.
15. The MSDE facilitates collaboration strategies between LEAs, Head Start, Judy Centers, Office of Child Care, and the State Pre-K programs to ensure that children and youth experiencing homelessness have access to public preschool programs, administered by the State or LEA, as provided to other children in the State.

	28. MSDE 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 29. Support Community Schools 30. Stakeholder engagement should be considerate of the different languages	16. Maryland is committed to the development, review and revision of State and LEA policies that remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences. 17. MSDE collaborates with the LEA's Office of Pupil Transportation to develop strategies – potentially including policy changes, training, or resource decisions - to support the LEAs in the establishment of prompt transportation arrangements of homeless students upon enrollment in school 18. MSDE assists LEAs with making activities available to homeless and eliminating barriers. 19. MSDE has a designated McKinney-Vento State Coordinator to facilitate the coordination of services to homeless students with LEAs and other State agencies and works with the Division of Special Education. 20. The Division of Early Childhood Development will be developing a transition resource guide to support LEAs. MOUs between LEAs and grant funded Early Childhood programs which specify transitions, sharing of data, shared professional development, curricula, and standards are currently in place through our grant funded PreK programs. 21. The Maryland Title II plan does not call out specific grade bands; rather it focuses on supporting principals, assistant principals, and other school leaders based upon data and needs assessments. Maryland recognizes the significance of delivering evidence-based professional learning to school leaders in the early years. Maryland is examining an aligned state literacy plan from pre-school through Grade 12.

		22. MSDE will be implementing the most recent legislation and will be providing professional development to LEAs in support of the disproportionality plan.
		23. The Plan addresses the broad spectrum of what MSDE plans to do regarding tiered interventions that address student discipline and behavioral needs. The MSDE will work with the State Board of Education Mental Health subcommittee to develop guidance and policy to address the mental health needs of students, including students at risk of committing suicide or who may be at risk of human trafficking.
		24. MSDE will monitor compliance with COMAR.
		25. There is a statewide taskforce currently reviewing aversive behavioral interventions. The charge of the taskforce is to consider the circumstances under which, and the schools or types of schools in which, restraint and seclusion shall be prohibited; and contraindications for restraint and seclusion, and who may authorize restraint and seclusion.
		26. The MSDE Division of Special Education/Early Intervention Services conducts on-site monitoring to local school system to ensure that IEPs and 504 plans are being implemented appropriately through the review of student records and the documentation of manifestation determinations.
		27. The MSDE Division of Special Education/Early Intervention Services conducts a data analysis of the child find processes in local school systems to determine the appropriateness and timeliness of a student referral to special education. The on-site monitoring in local school systems may include a review of the interventions provided (functional assessment, the development of a behavioral plan, and MTSS) and the impact of the interventions prior to the referral to child find. If inconsistent strategies

		are identified the MSDE, will issue a finding of noncompliance and provide technical assistance.
		28. Revision to educator preparation programs will require Universal Design for Learning as an instructional tool for all programs at all levels, as well as direct field experiences and internships with diverse student populations; revised literacy courses (12 hours elementary, 6 hours secondary and PreK-12) focus on all candidates demonstrating competency with all students, with particular reference to those with identified disabilities such as dyslexia, etc.
		29. MSDE uses West Ed's Four Domains of Rapid School Improvement as a framework for school improvement. An essential component of this framework is involvement of the community in the school improvement process. Each of the four domains emphasizes community partnerships to promote student academic success and well-being. This framework embraces and expands the concept of community schools by identifying actions at the state, district, and school level for community involvement in school improvement. CSI and TSI schools are required to develop action plans that identify community partnerships that will be established to foster student academic growth and well-being
		30. MSDE will work to address these needs and increase the availability of translations and translators when possible.
Latisha Corey President, Maryland PTA	1. Increase teacher retention by gathering input from teacher-exit surveys	1. The Division of Accountability captures data on teachers exiting their school systems and LEAs capture this data.
Demaune Millard Interim President & CEO Family League of Baltimore	1. Incorporate the Community School strategy as a key approach to ensure support for students living in areas of concentrated poverty	1. MSDE uses West Ed's Four Domains of Rapid School Improvement as a framework for school improvement. An essential component of this framework is involvement of the community in the

		school improvement process. Each of the four domains emphasizes community partnerships to promote student achievement and overall family well-being. This framework embraces and expands the concept of community schools by identifying actions at the state, district, and school level for community involvement in school improvement.
Theresa Mitchell Dudley Prince George's County Educators' Association	1. Supports MSEA and Maryland Coalition for Community Schools 2. Supports community schools 3. Evaluate educators on Professional growth; Protect planning time for teachers	1. Responses previously covered 2. MSDE uses West Ed's Four Domains of Rapid School Improvement as a framework for school improvement. An essential component of this framework is involvement of the community in the school improvement process. Each of the four domains emphasizes community partnerships to promote student achievement and overall family well-being. This framework embraces and expands the concept of community schools by identifying actions at the state, district, and school level for community involvement in school improvement. 3. Teacher Evaluation and planning time are not covered in the ESSA Plan
Margaret E. Williams Executive Director Maryland Family Network	1. More substantial Professional development for those working with children the preschool years. 2. Include strategies dealing with programs feeding into underperforming schools 3. Support SEFEL and PBIS 4. Family engagement for transitions begin early 5. English learners constitute an important percentage of children in early care and education prior to kindergarten 6. Include programs outside of public schools that prove services to EL children and their families 7. Include community based programs	1. Maryland's plan focuses on professional learning targeting data and needs assessments. Maryland recognizes the significance of delivering evidence-based professional learning to educators of students in the preschool years. 2. The Division of Early Childhood Development at MSDE provides technical assistance to support the academic growth of our youngest learners. Grants are provided, as funds are available, to support early learning programs in high-need areas. MSDE will include a variety of stakeholders in the identification and development of materials and strategies for implementing the Family and Community Engagement Outreach Plan. 3. MSDE continues to support these programs. Both

	8. Include approaches for children and youth who are neglected, delinquent, or at-risk 9. The KRA and ELA are currently available only in English. 10. Long term goals and strategies are needed to address the learning trajectories of students. 11. The time frame and trajectory begin at Kindergarten. 12. Gaps in children's readiness begin before kindergarten. 13. The PreK and Kindergarten assessment measures can be noted as a means to better develop root causes. 14. More rigorous interventions should include how student needs are being addressed prior to Kindergarten. 15. Addressing inequities and gaps that occur prior to kindergarten is critical. 16. The focus on transitions into kindergarten/elementary school and the inclusion of a transition guide are important. 17. English learners constitute an important percentage of children in early care and education prior to kindergarten. 18. MSDE is funding important work designed to narrow and eventually eliminate gaps that originate prior to kindergarten. 19. The history of preparing those working in early care and education settings should be mentioned, promoted, and continued. 20. The child care community should be mentioned in the collaboration to ensure that children experiencing homelessness	programs are being implemented in Maryland schools to improve culture and climate and reduce incidents of bullying, harassment, and intimidation. Information on Social Emotional Foundations for Early Learners (SEFEL) has been added to the plan. 4. The plan will include the development of tools, resources, and information representing the continuum of a student's education beginning at birth through post-secondary – from home to school settings including infants and toddlers to early care and education programs like home visiting, head Start, libraries and community-based programs to pre-kindergarten/elementary through high school; between grade levels; new settings; and high school to post-secondary education and career. 5. The EL/Title III Office collaborates with the Division of Early Childhood Development regarding professional learning and instructional strategies. 6. MSDE will work to improve communication between home and schools, including child care centers, early childhood programs, out of school time programs, LEAs, and libraries. 7. MSDE uses West Ed's Four Domains of Rapid School Improvement as a framework for school improvement. An essential component of this framework is involvement of the community in the school improvement process. Each of the four domains emphasizes community partnerships to promote student achievement and overall family well-being. This framework embraces and expands the concept of community schools by identifying actions at the state, district, and school level for community involvement in school improvement. 8. The MSDE facilitates collaboration strategies between LEAs, Head Start, Judy Centers, Office of Child Care, and the State Pre-K programs to ensure that children

	have access to public preschool programs. 21. Family engagement does not include direct service providers that support early care and education providers	and youth experiencing homelessness have access to public preschool programs, administered by the State or LEA, as provided to other children in the State. 9. MSDE has worked with the WIDA Consortium in the development of the KRA to make items more accessible to non-English speakers. Literacy items that measure English proficiency would not be appropriate to be translated. Teachers are also trained in providing appropriate accommodations and in scoring items for non-English speakers. The ELA is an observational formative assessment that allows teachers to translate and provide ratings for non-English speakers. Language will be added to the plan. 10. The long term goal is reducing non-proficient students by half by the year 2030. MSDE is beginning work to develop a Birth to 8 system that will create a more aligned system and developmentally appropriate goals. 11. Currently, Prekindergarten is voluntary, so trajectories for all students begin at Kindergarten. Standards, curriculum, and other activities are inclusive of PreKindergarten. The work on the Birth to 8 system will inform future work. 12. The KRA data showing achievement gaps will be reported on all state and local report cards which will highlight the work needed to be done through the new Birth to 8 system. 13. MSDE is working with Mathematica to research valid and reliable tools that could provide interim progress measures for Prek-2nd grade. 14. The recommendations that will come from the work of the Birth to 8 system workgroup will help inform the work of the CSI schools as well. Language will be added to the plan. 15. The recommendations that will come from the work of the Birth to 8 system workgroup will help inform

		the work of the CSI needs assessment and root cause analysis. Language will be added to the plan. 16. MSDE will bring a diverse stakeholder group including community-based programs, together in the development of the transition guide. 17. MSDE's DECD continues to address the needs of our dual language learners and to provide professional development for staff to better understand and support early language acquisition. 18. Thank you for your input. Language will be added to the plan. 19. Thank you for your input. Language will be added to the plan. 20. Language will be added to the plan. 21. The MD FACE team to be established will be inclusive of the work in MSDE DECD's Program and Collaboration Branch around family engagement.
Madeline Yates Executive Director Campus Compact Mid-Atlantic	1. Include civic and community engagement	1. Civic and community engagement is an allowable use of Title IV, Part A funds. LEAs will determine how to use their allocated funds.
Karleen Spitulnik Decoding Dyslexia Maryland	1. MSDE should create and fund a reading pilot program to demonstrate best practices enumerated in the Dyslexia Task Force Report. 2. MSDE should provide training to all primary school teachers, on indicators of reading failure, identification of at risk readers, and training in structured literacy instruction and the effective components of reading instruction defined in ESSA and IDEA. 3. MSDE should gather feedback for a definition of "evidence-based instructional strategies," and that any reading instruction recommendations	1. MSDE will review recommendations in the report. 2. MSDE is in the process of creating a state-wide comprehensive literacy plan. Literacy as defined in IDEA and ESSA will be a core focus of that plan. 3. MSDE will provide support to LEAs through regional workshops on evidence-based strategies and resources. In addition, the State is in the process of creating a state-wide comprehensive literacy plan. Literacy as defined in IDEA and ESSA will be a core focus of that plan. 4. The research on the benefit of teacher coaches is well documented and recognized state-wide. COMAR 13A.07.01 describes Teacher Induction and contains requirements for coaches and the training of coaches. Induction is also a focus of the Maryland Teacher

	focus on structured literacy instruction, early screening for reading difficulties and the effective components of reading instruction as defined in IDEA and ESSA. 4. LEAs should hire teacher coaches with Title II funds. Coaches are a best practice and provide real time suggestions to teachers working to change their methods of teaching. This best practice is part of the reading pilot program proposed by the Dyslexia Task Force. Teacher coaches would be a form of job-embedded professional development and would also be highly effective as part of the proposed New Teacher Induction. 5. The Regional Teacher Learning Centers should include a network of laboratory classrooms in the K-3 system. MSDE should develop training for teachers/professors who teach the four reading courses. 6. Recommendations for Parent Engagement	Induction, Retention, and Advancement Act of 2016. 5. Revised literacy courses (12 hours elementary, 6 hours secondary and PreK-12) focus on all candidates demonstrating competency with all students, with particular reference to those with identified disabilities such as dyslexia, etc. 6. MSDE will continue to support parent engagement initiatives.
<td colspan="3" align="center">**Superintendents, Boards of Education**</td>		
Public School Superintendents Association of Maryland (PSSAM) D'Ette Devine	1. Set the accountability standards using performance level descriptors for each rating level 2. Use a 4 or 6 level system 3. Reporting should include if a school met or did not meet a particular target rather than using the 5 star rating system 4. Concerned about identifying the lowest	1. The MSDE will engage stakeholders in creating descriptions for each of the ratings and develop meaningful criteria for each designation 2. The MSDE will explore models with various levels. 3. Most of the nuance will be added in reporting- a number of elements will be clear on the report card (whether a school met interim goals, equity, etc.). The MSDE is committed to engaging stakeholders in

five percent of non-Title I schools and how the State will provide additional support and resources for these schools 5. No mention of a comparison of like schools 6. PARCC assessments make up almost half of the elementary and middle school ratings 7. Student Growth Percentiles do not provide information that teachers can easily translate into instructional improvement 8. Opposed to using test scores as a way to measure "completion of a well-rounded curriculum" and as a measure of academic progress 9. No provision to exempt medically fragile children from the chronic absenteeism definition 10. Metric should be revised to "absenteeism" and weighted at 10 percent with five percent schools meeting 95 percent attendance and the other five percent for chronically absent (excluding medically fragile) 11. On credit for a well-rounded curriculum for elementary school it should be just "passing" 12. On credit for a well-rounded curriculum for middle school credit is only given for passing core content- where are the arts, physical education, and health? 13. High School credit for completion should mirror the high school graduation requirements	determining how best to report information on the Maryland Report Card. 4. MSDE is committed to supporting all of its lowest performing schools. MSDE is in the process of developing online tools as part of a resource hub that any school can use for school improvement. Also, MSDE will provide professional learning experiences focused on school improvement as part of state run leadership academies and executive officers' meetings. Additional support will be determined based on school need and available resources. 5. The MSDE is studying a similar schools comparison for reporting 6. The Draft ESSA State Plan as submitted reflects feedback from stakeholders and complies with ESSA and the Protect our Schools Act (State law) 7. The MSDE will carefully communicate all aspects of the accountability system to teachers and parents. 8. Thank you for your input 9. The MSDE is currently working on aligning state and federal reporting requirements 10. All indicators and measures must "meaningfully differentiate" between schools- absenteeism will not differentiate between schools 11. "Credit for" is currently defined as passing and meeting the requirements for the course. 12. The ESSA state plan reflects feedback from stakeholders and complies with ESSA and the Protect our Schools Act (State law). Research supports that academic achievement in middle school strongly predicts high school achievement. Middle school achievement includes not failing core courses (defined as we have). In addition, fine arts, physical education, and health are included in the "access to" measure. 13. All indicators and measures must "meaningfully

		differentiate" between schools- graduation requirements will not differentiate between schools and are already counted in the graduation indicator
Harford County Superintendent and Board of Education	1. Recommends the reporting aspect to include if a school met or did not meet a particular target rather than using the five-star rating. 2. Recommends that schools are rated according to their academic performance with schools of similar demographics across 3. Recommends MSDE provide summary date (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. Recommends reviewing the percentages at the all levels to ensure consistency. 5. Recommends the n-size be set to twenty students so the data is more reliable. 6. Recommends eliminating the use of grades from this model in all levels. 7. Recommends that chronic absenteeism be just absenteeism and count at 10%. Recommends 5% of this metric include attendance rate of 94% and the remaining 5% include chronically absent without including students with severe medical issues and not count excused absents	1. The MSDE will report each indicator at the all student and student group indicator. 2. Because ESSA requires a uniform accountability system throughout the state we cannot rate schools for accountability purposes according to varying subsets of schools. However, the MSDE will make such comparisons available for reporting purposed. 3. The MSDE will review and make available as much data as possible regarding the distribution of scores. 4. Maryland is limited by ESSA and the Protect Our Schools Act. 5. N-size has been a topic of gathering input from stakeholders. 6. Any measure that relies on a non-standardized determination such as passing courses will be re-examined to guard against improper inflation. The MSDE will work with all LEAs on the required data collections; however MCPS and other LEAs will need to adjust their reporting. 7. The MSDE is currently working on aligning state and federal reporting requirements; Attendance does not differentiate schools.
Frederick County President of the Board of Education	1. Strongly support SGP and have concerns about Growth to Target. 1. Appreciate the inclusion of ASVAB 2. Request that the survey include locally developed questions and be useful beyond accountability.	1. Study of Growth to Target will ensure no negative effects. 2. Thank you 3. The MSDE is collaborating with the Regional Educational Laboratory and Mathematica to develop a survey that is statistically valid, reliable, and can be

	3. At the middle school level, we encourage students to use their elective opportunities to explore their varied interest in order to help them focus their studies as they progress towards high school. We would encourage you to use the measure "Opportunities/Access to a well-rounded curriculum," to allow schools credit for offering career and technology exploratory courses. 4. We would suggest, in order to be more clear to schools, school systems, our families and communities, star or symbol ratings be accompanied by narrative descriptions to provide this kind of clarity. 5. We are particularly supportive of the focus on the pathways leading to a professional certificate and revising and refining specific requirements for certification and renewal.	used for accountability purposes. Part of the development process will include input from LEAs, but the MSDE must also ensure that administration of the accountability survey is uniform statewide. 4. The MSDE will review data as the accountability system is implemented. 5. The MSDE will engage stakeholders in creating descriptions for each of the ratings and develop meaningful criteria for each designation 6. Thank you
Jack Smith, Superintendent Montgomery County Public Schools (MCPS)	1. MD should set more ambitious long term goals and annual measurements of interim progress 2. The plan effectively proposes different goals and annual measures for each racial and ethnic group 3. MD should propose the SAT, IB, and AP as alternative instruments for the purpose of satisfying the high school math assessment requirements of ESSA 4. MD should not adopt the five star approach- use a score of 100 and rank based on that 5. Equity gaps should be measured in comparison to consistent, rigorous standards at the LEA and State level	1. The ESSA state plan reflects feedback from stakeholders for rigorous, ambitious and realistic goals. 2. The MSDE will clarify that the methodology for determining the goals and measures is the same for all student groups. 3. The MSDE is studying the use of AP and IB. 4. Thank you for your input. 5. The MSDE agrees that simply subtracting student group performance from the 'all students' is not the most advantageous method for this calculation. The MSDE is currently studying the appropriate methodology to ensure that the gap calculation is fair, meaningful, and clear. 6. The MSDE and the State Board of Education considered this method as well, but ultimately

	6. Reduce points based on equity gaps 7. Separately report academic and non-academic measures 8. Remove health from the elementary school access indicator 9. Clarify what counts for computational learning 10. Consider the Seal of Biliteracy, Junior Reserve Officers training corps, project lead the way, CTE credentialing program and magnet programs as HS measures of well-rounded 11. Require surveys to be locally administered 12. Length of survey should be no more than 25 minutes	decided on the method currently included in the ESSA plan 7. The MSDE is committed to engaging stakeholders in determining how best to report information on the Maryland Report Card. 8. The ESSA state plan reflects feedback from stakeholders and complies with ESSA and the Protect our Schools Act (State law). The MSDE will work with all LEAs on the required data collections; however MCPS and other LEAs will need to adjust their reporting. 9. All cross-discipline content will be further defined by an advisory committee which will give guidance and governance over defining applicable courses 10. Career and Technology Education (CTE) credentialing is included in the ESSA accountability program as "completed an industry certification from a CTE program. Project Lead the Way programs are approved CTE programs; The Seal of Biliteracy has been recommended for inclusion as part of the credit for completion of a well-rounded curriculum. Magnet programs are defined differently in each LEA and so cannot be used as a statewide measure. 11. The MSDE is collaborating with the Regional Educational Laboratory and Mathematica to develop a state-wide survey that is statistically valid, reliable, and can be used for accountability purposes. Part of the development process will include input from LEAs, but the MSDE must ensure that administration of the accountability survey is uniform statewide. 12. The exact survey parameters will take LEA input into account, but will also be selected to ensure validity of the survey instrument.
Sonja B. Santelises, Ed. D. Chief Executive Officer Baltimore City Public Schools	1. Include a mechanism to compare similar schools 2. Adopt a six-tier system with clear	1. The MSDE is currently studying a variety of methodologies such that schools can be compared to similar schools in a meaningful, statistically valid way.

	differentiation among schools 3. Unclear how many non-Title I schools will be identified and how the schools will be supported. 4. Develop the school climate with LEA's existing surveys in mind, and allow LEAs to tailor it to their own use.	This will be reported, in compliance with the Protect Our Schools Act. 2. The state is considering a four- or six-category system, and will also create descriptors and descriptions for each of the ratings, involving stakeholders, to ensure clear communication about the meaning of each category. 3. MSDE is committed to supporting all of its lowest performing schools. MSDE is in the process of developing online tools as part of a resource hub that any school can use for school improvement. Also, MSDE will provide professional learning experiences focused on school improvement as part of state run leadership academies and executive officers' meetings. Additional support will be determined based on school need and available resources. 4. The MSDE is collaborating with the Regional Educational Laboratory and Mathematica to develop a state-wide survey that is statistically valid, reliable, and can be used for accountability purposes. Part of the development process will include input from LEAs so that the survey is as useful as possible for additional purposes, but the MSDE must ensure that administration of the accountability survey is uniform statewide.
Dawn K. Branch President Cecil County Board of Education	1. Give less weight to PARCC assessments and more to those that provide immediate feedback to teaching and learning. 2. The five-star system is too similar to letter grades. 3. Schools will cluster according to demographic characteristics 4. The current Draft #2 places too much emphasis on English Learners (EL) for those systems and/or schools who have a	1. ESEA (page 24) requires that "the same academic assessments be used to measure the achievement of all…students in the state" and "be aligned with the challenging State academic standards." The PARCC assessments are a valid, reliable measure of academic achievement aligned to Maryland's state standards, while other assessments (such as locally-designed assessments and/or assessments that do not assess the full range of state standards) do not meet both of these criteria. 2. The state is considering a four- or six-category system,

	small number of these children. Their performance on PARCC will disproportionally impact the overall accountability rating. Here too, measuring the simple growth of all students is the preferred measure by which schools should be rated. 5. Consider additional assessments such as SAT, IB, and AP. 6. Include attendance rate in addition to chronic absenteeism. 7. Exclude medically-fragile students from chronic absenteeism. 8. Allow for LEA development of these surveys so that the surveys reflect their unique community makeup 9. We recommend that the proposed accountability model articulated in Draft #2 be applied to current LEA and school PARCC data in order to provide an idea of how it will function.	and will also create descriptors and descriptions for each of the ratings, involving stakeholders, to ensure clear communication about the meaning of each category. 3. The MSDE is currently studying a variety of methodologies such that schools can be compared to similar schools in a meaningful, statistically valid way. This will be reported, in compliance with the Protect Our Schools Act. 4. ESSA requires separate indicators for academic achievement of all students, including English Learners, and progress in achieving English language proficiency. 5. The MSDE is studying the use of AP and IB. 6. A study of Maryland data indicates that the attendance rate does not differentiate among schools; as required by ESSA, all parts of the accountability system must do so. In addition, guidance from the Education Trust and others states that average daily attendance masks chronic absenteeism. 7. The MSDE is currently working on aligning state and federal reporting requirements 8. The MSDE is collaborating with the Regional Educational Laboratory and Mathematica to develop a state-wide survey that is statistically valid, reliable, and can be used for accountability purposes. Part of the development process will include input from LEAs so that the survey is as useful as possible for additional purposes, but the MSDE must ensure that administration of the accountability survey is uniform statewide. 9. The MSDE is committed to engaging stakeholders in determining how best to report information on the Maryland Report Card. Part of this engagement process will be assurances that information is

Maryland Association of Boards of Education (MABE) Joy Schaefer/Jill Ortman-Fouse	1. MD should use a rating system which reserves any one star designation for the subset of lowest performing Title I schools 2. MD should add more nuance to the categories 3. MD should use a three year timeline for TSI schools that have not met its growth target 4. MD should add enrollment in magnet programs such as STEM and Visual and Performing Arts or school-sponsored athletic and extracurricular activities to the definition of a well-rounded curriculum 5. MD should include the high school graduation requirements in definition of well-rounded curriculum	1. The MSDE will engage stakeholders in creating descriptions for each of the ratings and develop meaningful criteria for each designation 2. Nuance will be added in reporting- a number of elements will be clear on the report card (whether a school met interim goals, equity, etc.). The MSDE is committed to engaging stakeholders in determining how best to report information on the Maryland Report Card. 3. TSI schools that do not meet annual targets over two years will be classified as consistently underperforming. Consistently underperforming schools will be identified once every three years. As a result, TSI schools are given a three year timeline to improve. 4. These programs are not consistent across LEAs and therefore cannot be used as a statewide measure 5. All indicators and measures must "meaningfully differentiate" between schools- graduation requirements will not differentiate between schools and are already counted in the graduation indicator
Higher Education		
Community College Presidents Dr. Bernie Sadusky	1. Recommend that enrollment at a community college should count.	1. Enrollment in post-secondary in 12 months was removed as a measure to ensure that all measures could be completed within the preK-12 window.
Nancy S. Grasmick Presidential Scholar	1. The goal of reducing non-proficient students by half by the year 2030 is inadequate. 2. Growth measure should include growth-to-standard. 3. Achievement measures such as SAT, AP,	1. A study of Maryland data indicates that this goal results in annual measurements of interim progress that are ambitious and attainable, both of which were prioritized by our stakeholders and state board. 2. Beginning in 2017-18, Maryland will study a growth-to-standard measure for reporting and inclusion in

	and other college readiness assessments should be added to provide valid assessment options for students on the higher ends of achievement. 4. Use performance-level indicators to designate school summative ratings. 5. The Board should explore ways to allow individual schools to highlight and celebrate the special successes they have with innovative programs and initiatives.	the accountability system, in combination with student growth percentiles. The anticipated timeline for study and determination of feasibility is three years. Growth-to-standard will be included only if it demonstrates it would do no material damage. 3. The MSDE is studying the use of AP and IB. 4. The MSDE will create descriptors and descriptions for each of the ratings, involving stakeholders, to ensure clear communication about the meaning of each category. 5. The MSDE will work with stakeholders to identify methods to highlight school successes and to identify best practices.

Individual Feedback

Stephen Schroth Towson University- GT Professor	1. Readiness for post-secondary success does not address the needs of gifted learners 2. The level of readiness as indicated by SAT and ACT scores is below that which each organization believes indicates college and career readiness 3. MD should provide more support for students aiming to go to college or university 4. Suggesting acceleration or dual enrollment programs at local colleges would benefit gifted children more than AP or IB programming 5. Implement a mandate that a class that prepares teachers to teach gifted and talented children be required for pre-certification teachers 6. Track gifted and talented children separately	1. Thank you for the input 2. The MSDE will make sure that standards are appropriate to the test and are the result of an independent nationally-recognized standard setting process 3. This is a local responsibility 4. Dual Enrollment is included in the School Quality/Student Success (SQSS) indicator 5. Gifted students who fall "in the margins" at the upper end of the cognitive spectrum are one of the major foci of course revisions for both elementary (2017) and secondary literacy (2016) within educator preparation programs. The 2017 revision of State standards for educator preparation programs in Maryland will also require teacher candidate competency in the Universal Design for Learning, designed specifically with gifted students in mind. 6. MD is currently reporting on all groups required in ESSA. There is not a statewide common definition of gifted and talented students, and therefore including gifted students as a student group would result in an accountability system that was not statewide

Cara Jackson MCPS	1. N-size of 10 is very small 2. Measuring progress through proficiency rates is ill-advised 3. Where do we list what will be measured in the report card? 4. Graduation targets indicate we expect more of schools serving larger portions of certain student groups 5. State should consult with local school systems about exiting children from ESOL 6. Use Student Growth Percentiles (SGP) to determine academic growth and to identify CSI and TSI schools 7. Identifying schools as TSI schools because of less than 95 percent participation is punitive not supportive 8. MD should provide evidence of the effectiveness of training programs that CSI educators will be required to attend The plan mentions evidence based strategies such as career academies, middle college high school, talent search, and check and connect- Middle high school and check and connect do not receive high ratings in the what works clearinghouse	1. The MSDE has doubled the N-size used for accountability from 5 to 10. An N-size of 10 will align the reporting and accountability N-size to provide greater transparency of all reporting. 2. Progress is measured through Student Growth Percentiles (SGP), not proficiency rates. 3. This is not a requirement of the ESSA State Plan. The MSDE will provide opportunities for stakeholders to develop suggestions for the report card. 4. We understand that "cut the non-proficient rate in half in thirteen years" can be considered uniform because it is applied to all student groups in the same way, or non-uniform because the outcome of this calculation varies by the baseline proficiency rate. The state board of education considered this as well when they decided on this method. 5. Local Education Agency (LEA) representatives are part of the accountability workgroup and the EL Advisory committee that made these recommendations 6. This is what the MSDE is proposing as part of the ESSA State Plan. 7. The term "targeted support and improvement" is the term used by the federal government in ESSA 8. All resources will be thoroughly vetted to ensure they meet ESSA evidence standards The MSDE is reviewing the current ESSA State Plan draft to ensure any program that is mentioned by name meets the ESSA evidence standards, whether that is done using the What Works Clearinghouse or other high quality empirical research
Sherry Mervine Fine Arts Educator	1. Concerned that the requirement to not include fine arts and physical education in the secondary school requirements for 8th grade and high school graduation by this framework's standards may	1. The ESSA state plan reflects feedback from stakeholders and complies with ESSA and the Protect our Schools Act (State law). Research supports that academic achievement in middle school strongly predicts high school achievement. Middle school

	drastically affect music and PE programs across the State by reducing student enrollment in these classes in lieu of other courses, jeopardizing teacher positions, and program excellence.	achievement includes not failing core courses (defined as we have). In addition, fine arts, physical education, and health are included in the "access to" measure.
Katharine Rylaarsdam sent to MSDE	1. Readiness for Post-Secondary Success is in exclusively academic terms 2. The five star system sets up schools for discrimination against schools and students in impoverished or unstable areas 3. Educational assessment must be about more than passing academic tests 4. Experts (for CSI plans) for the most part have no experience in stressed communities 5. Proposals for family outreach are grossly inadequate and geared to the middle class.	1. Per ESSA, measures must be consistent at all grade bands, across the State. 2. The State is considering a four- or six-category system, and will also create descriptors and descriptions for each of the ratings, involving stakeholders, to ensure clear communication about the meaning of each category. 3. Per ESSA, measures must be consistent at all grade bands, across the State. 4. The MSDE is collaborating with educators across the State and national experts with a variety of backgrounds to develop strategies for success for low performing schools. 5. Family Engagement strategies are aligned with the U.S. Department of Education Dual Capacity Framework, National PTA Standards, and federal and state requirements for family engagement.
	Additional Feedback	
Lupi Quinteros-Grady Prince George's County Board of Education – Member	1. Support for the recommendations of the TeachPlus policy brief "Teacher Leader Recommendations for Maryland's New Accountability Framework"	1. Thank you for the feedback
Maryland Coalition for Community Schools (MD4CS)	1. Recommend a community school strategy for CSI and TSI schools to "promote student achievement and overall well-being."	1. MSDE uses West Ed's Four Domains of Rapid School Improvement as a framework for school improvement. An essential component of this framework is involvement of the community in the school improvement process. Each of the four domains emphasizes community partnerships to promote student achievement and overall family

		well-being. This framework embraces and expands the concept of community schools by identifying actions at the state, district, and school level for community involvement in school improvement.
Maryland Hunger Solutions	1. Include language in Maryland's ESSA Plan that will promote increasing access and participation in the federal nutrition programs, particularly the school, summer, and after school nutrition programs 2. Increase access to school Breakfast and Lunch. 3. Increase access to Summer Food Service Program (SFSP). 4. Increase access to afterschool meals. 5. Implement best practices	1. The federal nutrition plan is not included under ESSA. 2. MSDE conducts outreach to promote the community eligibility provision, provides training and technical assistance to promote alternate delivery models in the school breakfast program, and is improving the direct certification system for seamless and paperless identification of students eligible for free meal benefits. 3. LEAs and MSDE are required by USDA to promote the SFSP each year and State and national electronic systems are in place so families can find sites near their homes. 4. Outreach is ongoing to encourage LEAs and nonprofit organizations to provide afterschool meals during the school year through the Child and Adult Care Food Program. 5. Best practices are shared within the Statewide Partnership to End Childhood Hunger and disseminated to participants through training, technical assistance, and communications.

About the Mid-Atlantic Comprehensive Center

The Mid-Atlantic Comprehensive Center at WestEd (MACC@WestEd) helps state leaders with their initiatives to implement, support, scale up, and sustain statewide education reforms. We work closely with state leaders in the Mid-Atlantic region of Delaware, Maryland, New Jersey, Pennsylvania, and the District of Columbia. To learn more about MACC@WestEd visit macc-atwested.org or to learn about the technical assistance network funded by the U.S. Department of Education, visit www.ed.gov.

Summary of Public Feedback to Maryland's Second Draft of Every Student Succeeds Act State Plan

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Acknowledgement

Disclaimer Language

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Purpose

With passage of the Every Student Succeeds Act (ESSA) in 2015, the Maryland State Department of Education (MSDE) created an ESSA Internal Committee consisting of members from each division within MSDE as well as Title Directors to facilitate the writing and implementation of MSDE's ESSA State plan. The ESSA Internal Committee also designed a two-pronged stakeholder engagement process that relies on participation from groups of diverse thought leaders and practitioners, as well as the public, to inform recommendations to support the development of the State plan. MSDE engaged the public through two rounds of online surveys and five regional face-to-face Listening Tour meetings across Maryland. The first round of surveys opened in the early Spring, 2017; the second round of surveys opened in the summer of 2017.

In January 2017, MSDE requested the Mid-Atlantic Comprehensive Center at WestEd (MACC@WestEd) provide support to the ESSA Internal Committee by organizing and summarizing public feedback from its first survey and Listening Tour meetings. To respond to this request, MACC@WestEd staff analyzed and drafted a summary of the multiple-choice and open-ended survey responses from the first round of surveys as well as Listening Tour feedback in March, 2017. This summary pertained to the following topics: *goals, assessments and accountability; supporting excellent educators and educator equity; and supporting all students and low-performing schools.*

This report, for parents, educators, business, and other community members, summarizes the themes in feedback received from MSDE's second round of public surveys — feedback in response to MSDE's second draft of its ESSA State Plan — that is helping inform MSDE's development of its *final*-draft State plan under ESSA.

This document is divided into the following sections:

- **Overview of MSDE's Stakeholder Engagement - Public Engagement Strategy** provides a summary of how MSDE has approached engaging the public, including a description of the second public engagement survey soliciting feedback of the second draft of ESSA State plan, as well as the breakdown of roles and counties of respondents who completed the survey.

- **Long-Term Goals and Measurements of Interim Progress** presents respondents' feedback from one survey item.

- **School Support and Improvement** presents respondents' feedback from two survey items.

- **Supporting Excellent Educators and Educator Equity** presents respondents' feedback from nine survey items.

- **Supporting All Students** presents respondents' feedback from four survey items.

Overview of MSDE's Stakeholder Engagement — Public Engagement Strategy

This section briefly describes Maryland's current stakeholder engagement strategy. MSDE's overall stakeholder engagement strategy is multi-faceted and includes a broad array of stakeholders from various groups, both internal to MSDE as well as external as indicated on [MSDE's ESSA landing page](). For this summary, we focus on MSDE's stakeholder engagement strategies to solicit public feedback to the second draft of its ESSA State plan. MSDE engaged the public through an online survey.

Overall, the majority of survey respondents responded favorably to MSDE's second draft of its ESSA State Plan. Over two-thirds (68 percent) of respondents indicated they supported or highly supported MSDE's second draft.

MSDE's Online Public Survey

MSDE developed an online survey requesting public feedback to the second draft of its ESSA State plan. The survey was located on MSDE's ESSA landing page and open to the public from July until August 10, 2017. The survey consisted of 21 questions, all of which were multiple choice. Descriptive analyses were conducted on the multiple-choice responses. The survey addressed the following four main topics:

1. Long-Term Goals and Measurements of Interim Progress

2. School Support and Improvement

3. Supporting Excellent Educators and Educator Equity

4. Supporting All Students

The survey allowed respondents to pick the topic(s) on which they wanted to offer feedback. The survey was anonymous (but allowed respondents to provide their name and contact information if they chose) and did not require respondents to answer any questions, other than the role that best described them. A total of 447

surveys were completed by residents of all 24 counties in Maryland[1] and in the following roles[2]: teacher (26 percent), parent (20 percent), student (17 percent), principal/school staff (17 percent), business/community representative (6 percent), superintendent/district (5 percent), education advocate (4 percent), higher education representative (3 percent), state or local school board member (2 percent). While this summary reflects the responses of these 447 respondents, it does not necessarily represent the opinions and feedback of all stakeholders across Maryland. The survey respondents were neither a sample representative of all stakeholders nor can be generalized to the broader population.

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[1] Survey respondents, by county of residence are as follows: Allegany (1 percent); Anne Arundel (9 percent); Baltimore City (6.6 percent); Baltimore County (7.3 percent); Calvert (1.4 percent); Caroline (1.4 percent); Carroll (2 percent); Cecil (1 percent); Charles (9.6 percent); Dorchester (1.4 percent); Frederick (3.7 percent); Garrett (0.5 percent); Harford (3.2 percent); Howard (6 percent); Kent (0.7 percent); Montgomery (8.2 percent); Prince George's (13.7 percent); Queen Anne's (1.6 percent); St Mary's (2.7 percent); Somerset (1 percent); Talbot (1.8 percent); Washington (6.4 percent); Wicomico (1.4 percent); Worcester (1.6 percent); Not in Maryland (0.5 percent); Representing multiple school systems (1.8 percent); No specific school system (5 percent)

[2] Because respondents could indicate more than one answer, percentages may not add up to 100 percent.

Long-Term Goals and Measurements of Interim Progress

The survey asked respondents to indicate how often schools should be measured on interim progress for academic achievement, graduation rate, and English Learner Proficiency, as between now and school year 2030, schools must meet long term goals laid out by MSDE.

Slightly higher percentages of respondents indicated schools' interim progress on these measures should be conducted annually, but one-third thought progress should be measured every two years and 31 percent thought progress should be measured every three years as indicated in Figure 1.

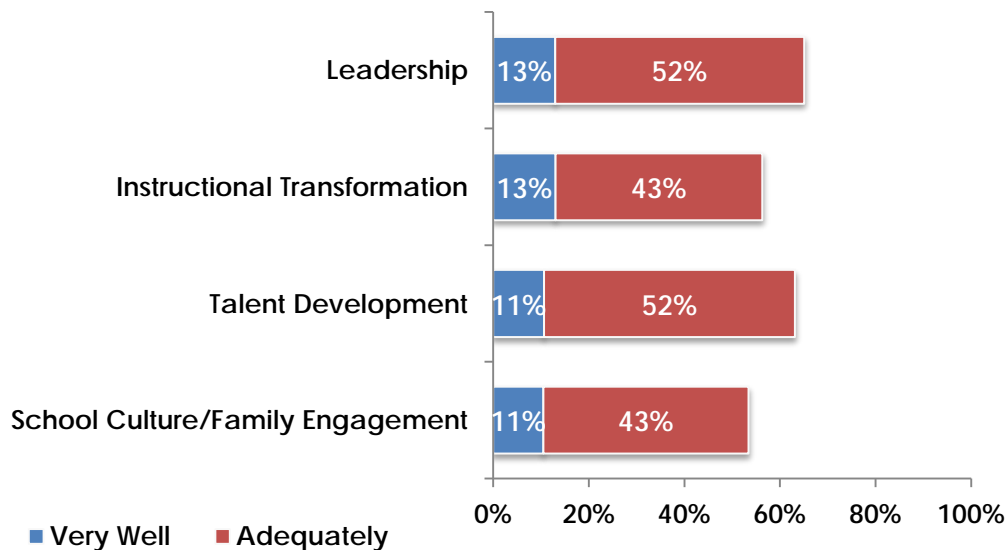**Figure 1. How often should schools be measured on interim progress? (258 Responses)**
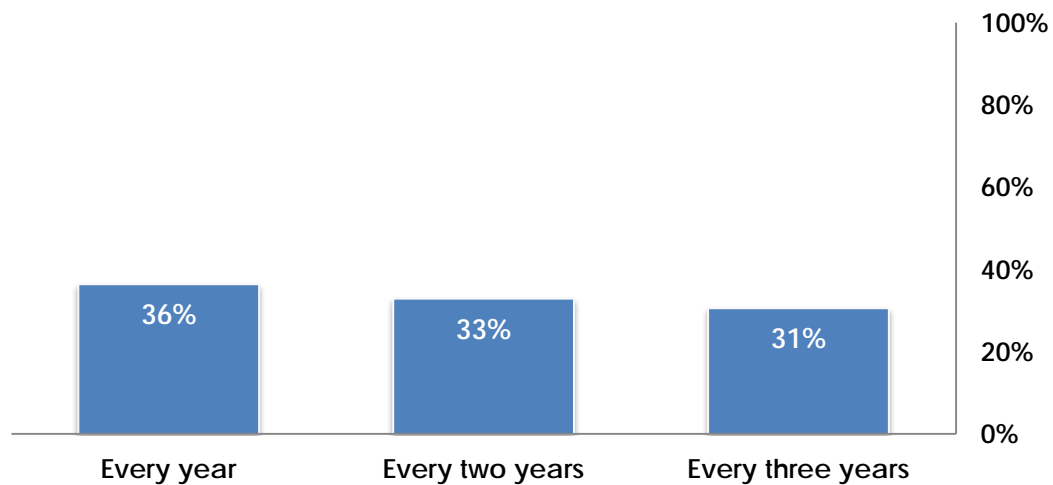
School Support and Improvement

In terms of school improvement, MSDE has adopted the Center on School Turnaround's Four Domains for School Improvement that include leadership, talent development, instructional transformation and school culture/family engagement. The survey asked respondents to indicate how well they thought MSDE's second draft ESSA State plan addressed each of the four domains, as well as which domain(s) would need the most support.

Respondents to the survey thought MSDE's ESSA State plan addressed leadership and instructional transformation, more so than school culture/family engagement and instructional transformation, as indicated in Figure 2.

Figure 2. Based on your review of MSDE's ESSA plan, how well do you think the plan addresses the four domains for school improvement: Leadership, talent development, instructional transformation, and school culture/family engagement? (249 Responses)

Following suit, survey respondents also indicated instructional transformation and school culture/family engagement would need the most support to implement, as indicated in Figure 3 below.

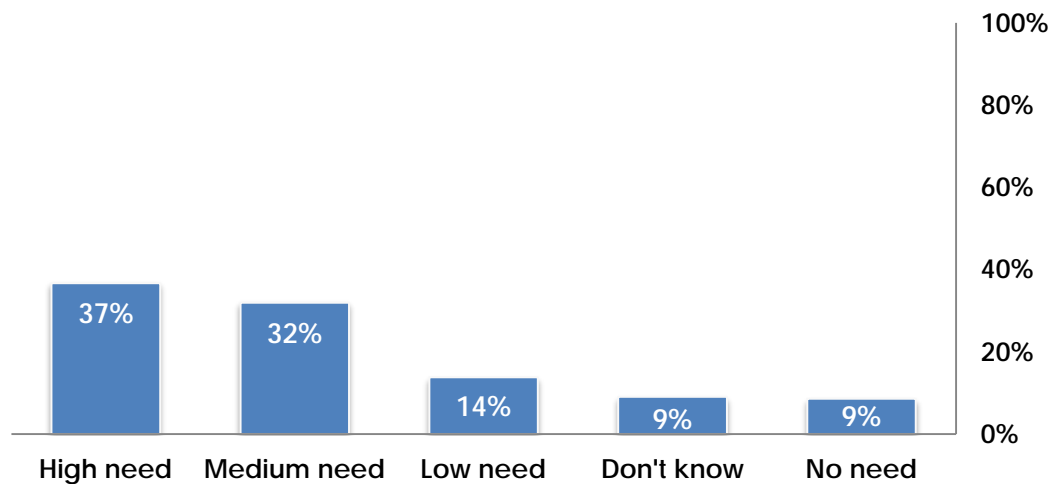**Figure 3. Which of these four domains do you think would need the most support? (247 Responses)**
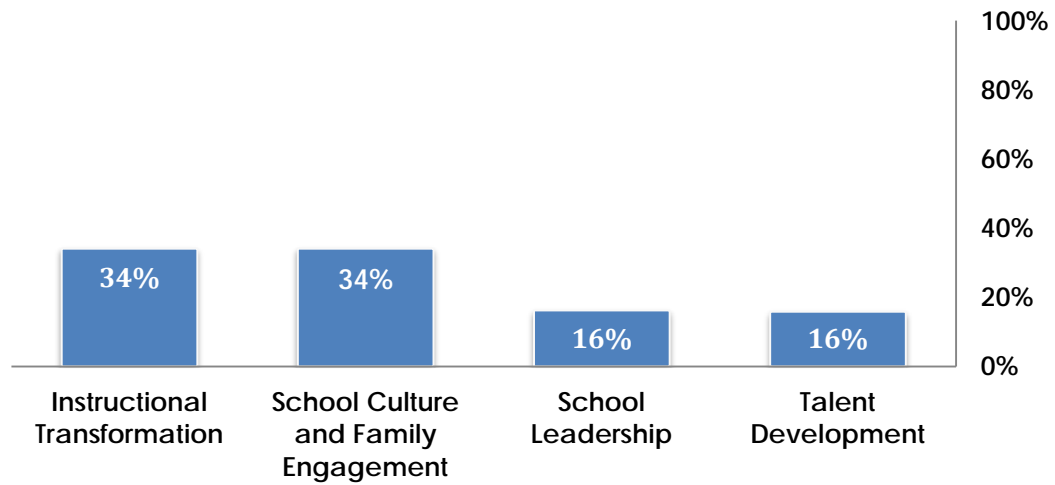
Supporting Excellent Educators and Educator Equity

Teacher Preparation Programs

The survey asked respondents to indicate (1) what degree there was a need for a state-approved online teacher preparation program and (2) whether local school districts should support a state-approved online teacher preparation program by providing field experiences and internships on a schedule compatible with an individual already working in the local school system who wishes to be a teacher.

Most survey respondents indicated a high (37 percent) or medium (32 percent) need for a state-approved online teacher preparation program, as indicated in Figure 4.

Figure 4. To what degree is there a need for a State-Approved Online Teacher Preparation Program that would be available to potential teachers in all regions of the State? (210 Responses)

Respondents to the survey also determined that local school systems should support a state-approved online teacher preparation program, as shown in Figure 5. Close to 80 percent of respondents indicated in the affirmative.

Figure 5. Should local school systems support State-Approved Online Teacher Preparation Programs by providing field experiences and internships on a schedule compatible with an individual already working in the local school system who wishes to be a teacher? (208 Responses)
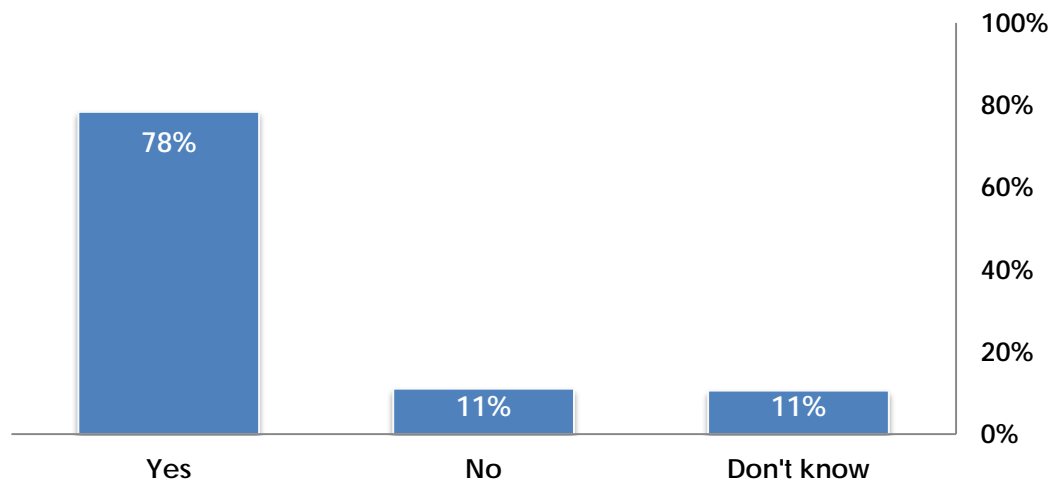

Supporting Excellent Educators

In response to feedback received by MSDE through the first round of surveys and Listening Tours about teachers needing more time to plan and collaborate, MSDE's second survey asked respondents to provide their thoughts on what they would be willing to change for teachers to have this additional time. The survey also asked respondents to provide their opinion about strategies MSDE should consider in supporting educators, such as (1) what activities/methods/tools would be helpful to increase the professional growth of educators, (2) what areas educators need professional learning, and (3) what factors impact educator effectiveness (and how much). Finally, the survey asked respondents to indicate (4) which methods were important in supporting teacher leaders and (5) which leadership opportunities teachers needed more access.

Providing Teachers More Time to Plan and Collaborate

Other than increase class size, respondents to the survey were willing to make several changes to provide teachers with more time to collaborate and plan. Respondents were most favorable in making changes that resulted in a weekly (65 percent) or daily (41 percent) flexible schedule with built-in collaboration time, but some (34 percent) were also willing to increase the length of the school day to provide this time to teachers, as indicated in Figure 6 below.
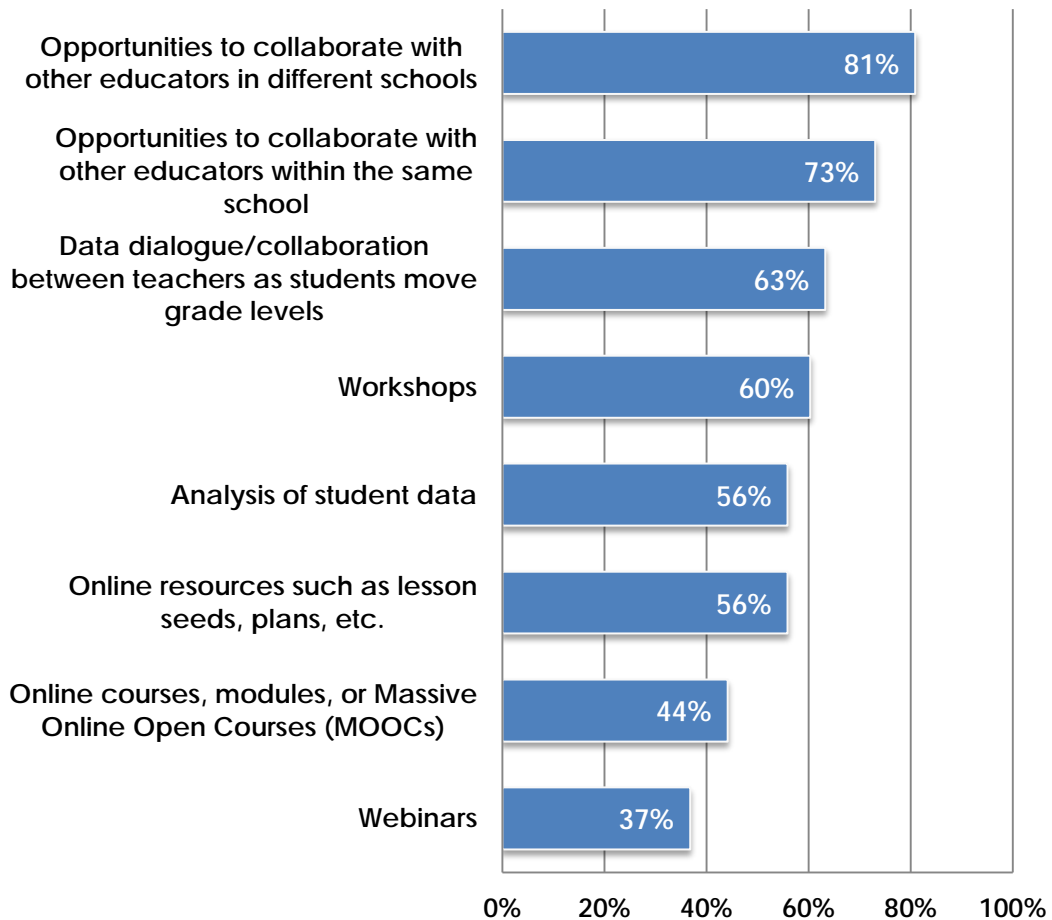
Figure 6. In order to provide more time for planning and collaboration, what would you be willing to change? (Choose all that apply) (203 Responses)
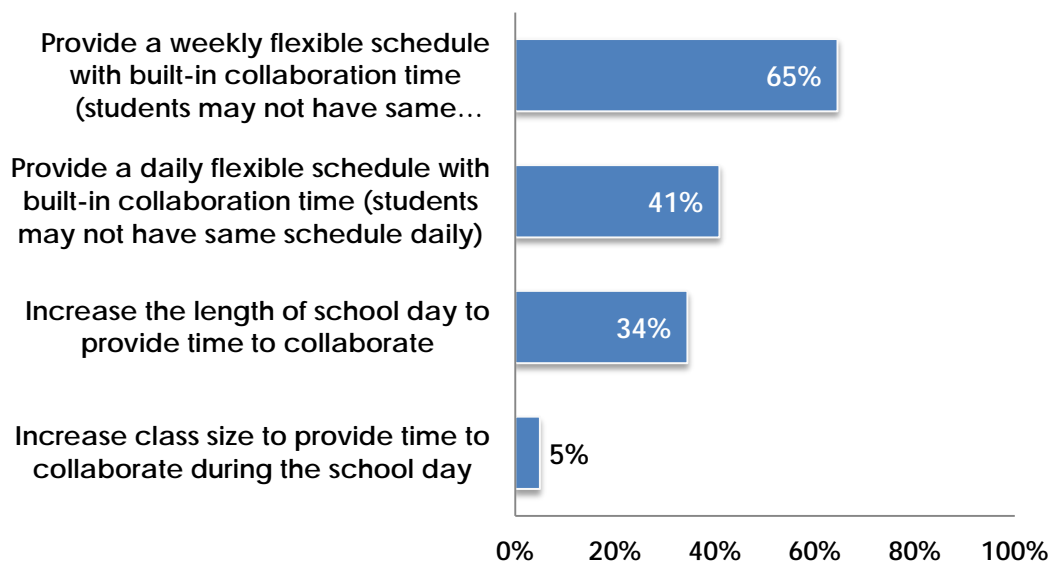
Supporting Teacher Professional Growth

Respondents want to see more time for teachers to collaborate with peers including educators in other schools (81 percent) and educators within the same school (73 percent) to increase the professional growth of educators. Similarly, participating in data dialogues with teachers as students move grade levels (63 percent) and analyzing student data (56 percent) and was also seen as helpful. Respondents indicated they want workshops (60 percent), providing online resources such as lesson plans (56 percent), or online courses (44 percent) and webinars (37 percent) were helpful, as shown in Figure 7.
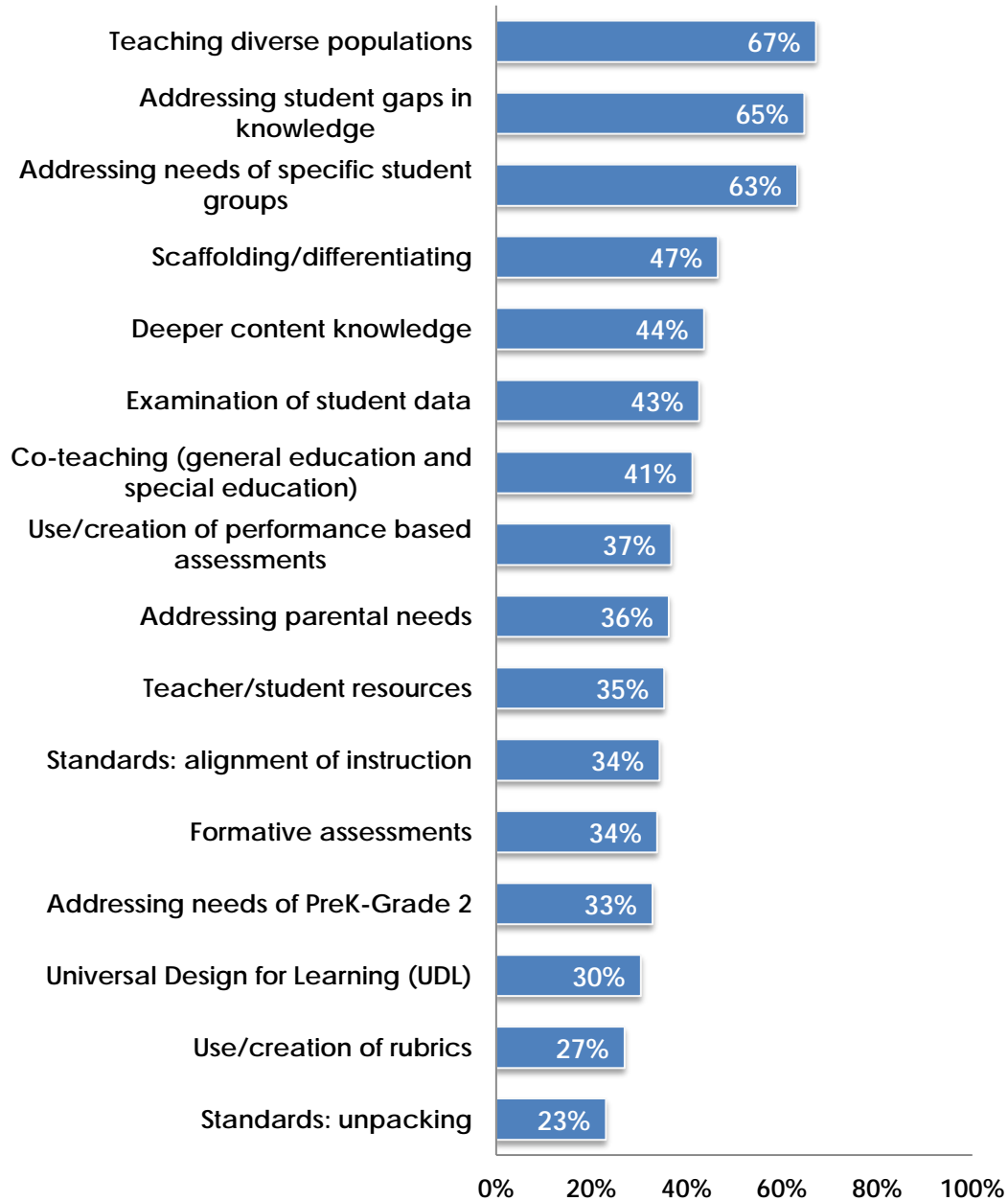
Figure 7. What activities/methods/tools do you believe would be helpful to increase the professional growth of educators? (Choose all that apply) (204 Responses)

Activity	Percentage
Opportunities to collaborate with other educators in different schools	81%
Opportunities to collaborate with other educators within the same school	73%
Data dialogue/collaboration between teachers as students move grade levels	63%
Workshops	60%
Analysis of student data	56%
Online resources such as lesson seeds, plans, etc.	56%
Online courses, modules, or Massive Online Open Courses (MOOCs)	44%
Webinars	37%

The majority of respondents indicated teachers needed professional learning in educating students with varying needs, such as teaching diverse populations (67 percent), addressing student gaps in knowledge (65 percent) and addressing needs of specific student groups (63 percent). See Figure 8.

Figure 8. What do you believe are the areas of need for educator professional learning? (Choose all that apply) (204 Responses)

Area	Percentage
Teaching diverse populations	67%
Addressing student gaps in knowledge	65%
Addressing needs of specific student groups	63%
Scaffolding/differentiating	47%
Deeper content knowledge	44%
Examination of student data	43%
Co-teaching (general education and special education)	41%
Use/creation of performance based assessments	37%
Addressing parental needs	36%
Teacher/student resources	35%
Standards: alignment of instruction	34%
Formative assessments	34%
Addressing needs of PreK-Grade 2	33%
Universal Design for Learning (UDL)	30%
Use/creation of rubrics	27%
Standards: unpacking	23%

A high percentage of respondents indicated the top three factors that would have a large impact on educator effectiveness included supportive school leadership (91 percent), a positive school climate/culture (87 percent), and peer collaboration (74 percent). See Figure 9.

**Figure 9. How much impact do you think each factor below has on educator effectiveness? (205 Responses)**
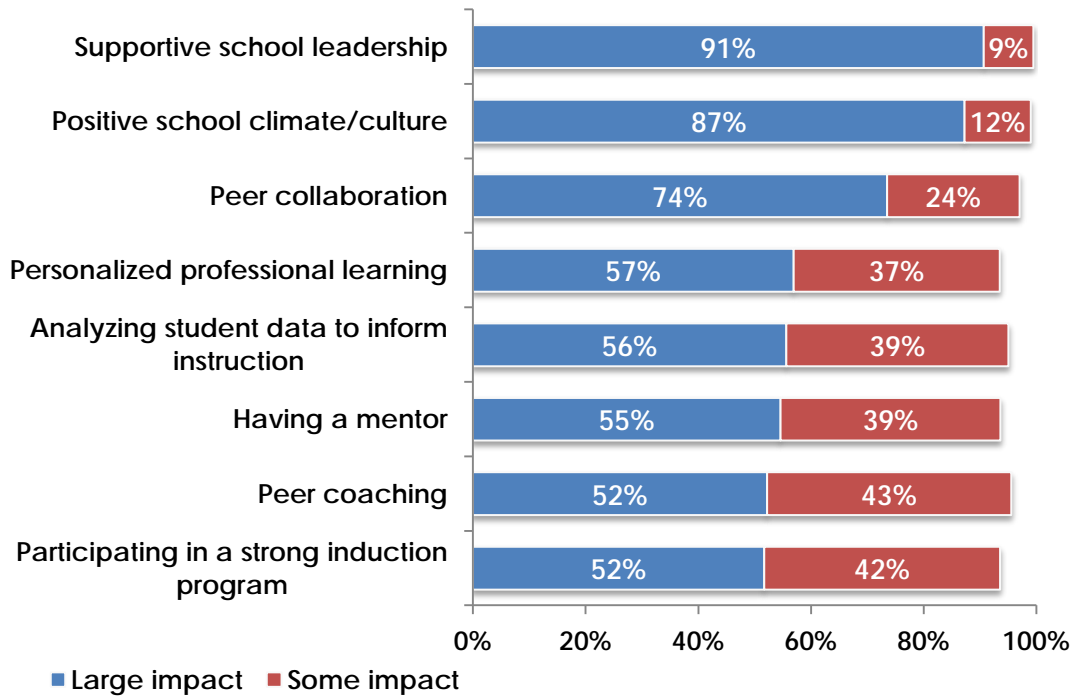
Supporting Teachers as Leaders

Respondents indicated several methods to be important or very important in supporting teacher leaders across Maryland. One such method was using teachers to facilitate state-wide initiatives around policy goals in education (83 percent). Respondents also cited creating a state-wide teacher-leadership framework that defined the professional development needed to be a teacher leader (78 percent) and providing micro-credentials (i.e. competency based credentials that allow educators to focus on a discrete skill) (83 percent) were important or very important in supporting teacher leaders, as indicated in Figure 10.

Figure 10. How important are each of the methods below in supporting teacher leaders across Maryland? (204 Responses)
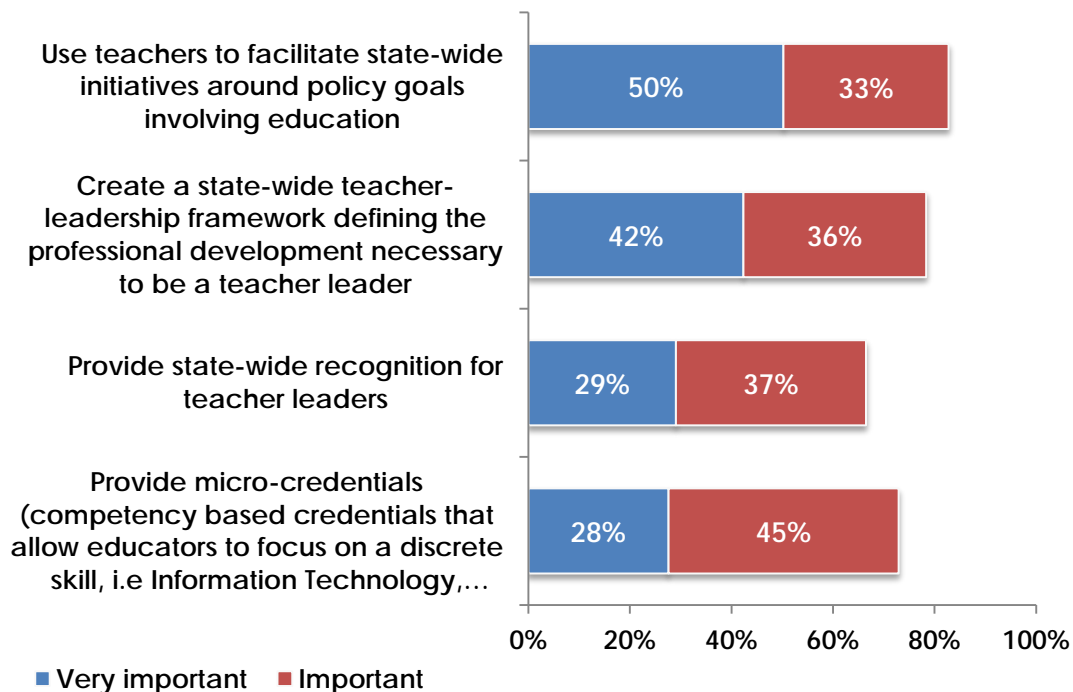
Most respondents indicated teachers need more access to leadership opportunities with their peers, such as peer collaboration (67 percent) and peer coaching (61 percent). Respondents also indicated teachers need opportunities to make decisions, such as school improvement decisions (66 percent) and school based professional learning decisions (66 percent). Mentoring from a seasoned teacher was also indicated by 65 percent of the respondents, as indicated in Figure 11.

Figure 11. What are some leadership opportunities to which teachers need more access? (Choose all that apply) (200 Responses)

Educator Equity

The survey asked respondents to determine the level of effectiveness of methods in increasing equitable access to effective teachers for all students across Maryland.

Almost all respondents (87 percent) indicated increasing professional learning and support for teachers in low-performing schools was an effective or very effective way to increase equitable access to effective teachers for all students across Maryland. Respondents also found increasing recruitment efforts (72 percent) and providing regional support centers for resources (71 percent) were also effective or very effective, as indicated in Figure 12.

Figure 12. How effective do you believe the following ways are to increase equitable access to effective teachers for all students across the State? (203 Responses)
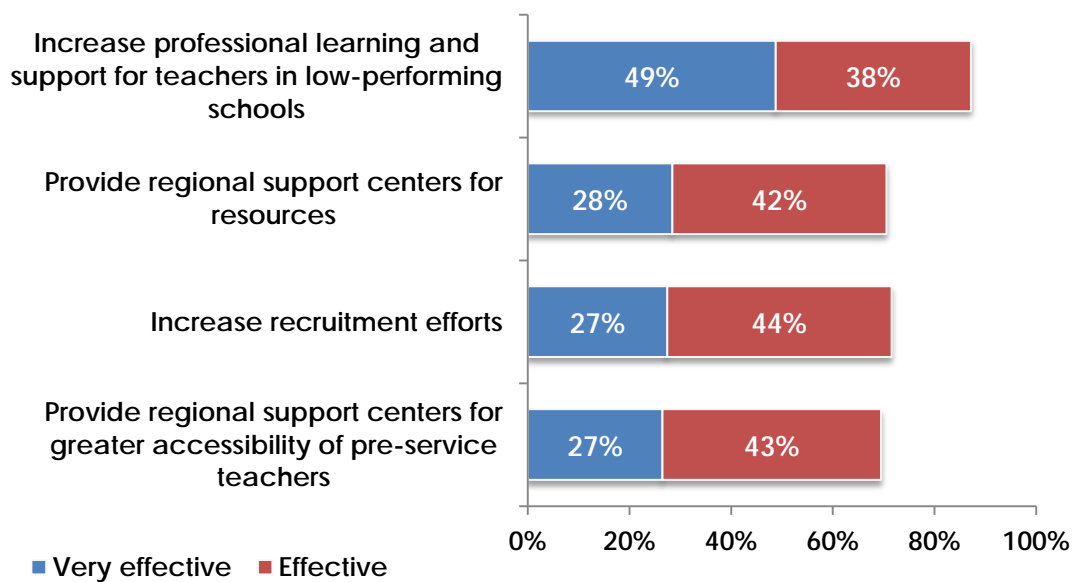
Supporting All Students

Supporting English Learners

The survey asked respondents to indicate (1) the number of years recently-exited English Learners (EL) (students who were receiving services and support for English Language proficiency but now demonstrate proficiency in English) should be included in the State accountability system and (2) the level of effectiveness of resource(s) in helping ELs, as funded by federal Title III.

The majority of survey respondents (54 percent) indicated ELs should be included in the State accountability system for an additional 2 years after exiting the program, as indicated in Figure 13.
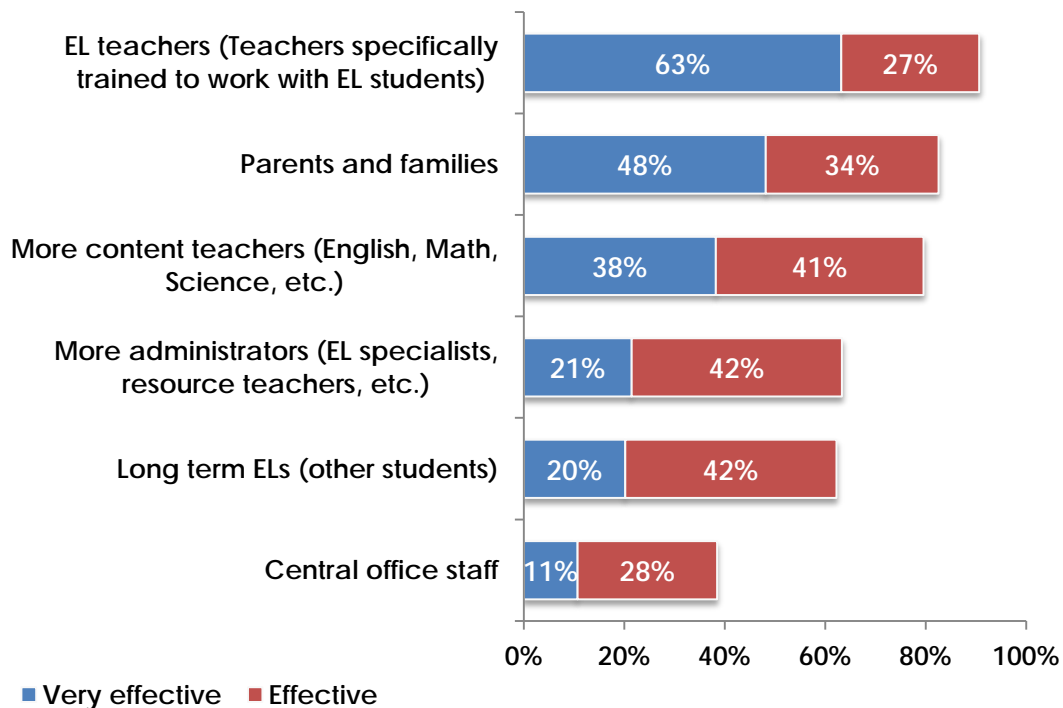
Figure 13. How many years should recently exited English Learners be included in the State accountability system? (191 Responses)
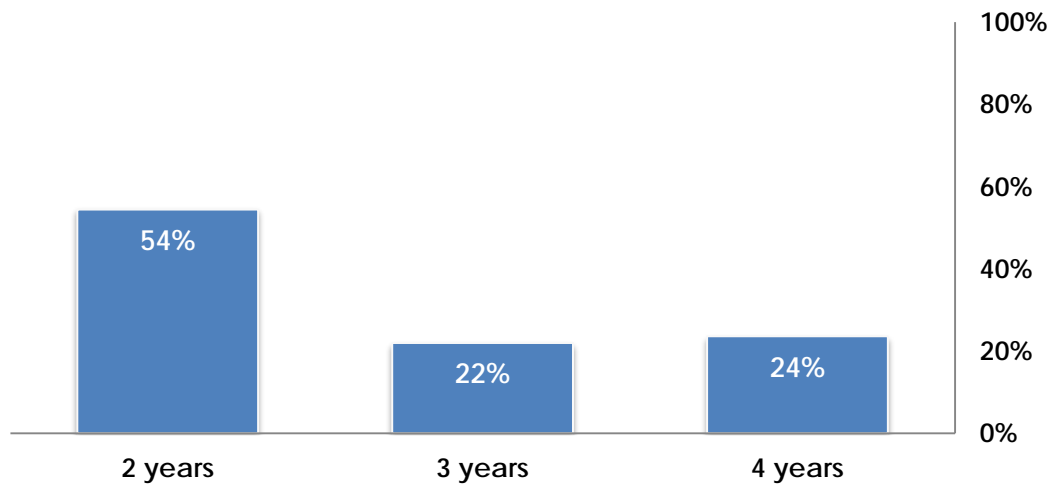
Most respondents (91 percent) indicated EL teachers (i.e. teachers that have been specifically trained to work with EL students) were effective or very effective in helping EL students, while parents and families (83 percent) and having more content teachers in English, mathematics and science (79 percent) were also effective or very effective resources. See Figure 14.

Figure 14. How effective do you believe each resource will be in helping EL students? (195 Responses)

Legend: ■ Very effective ■ Effective

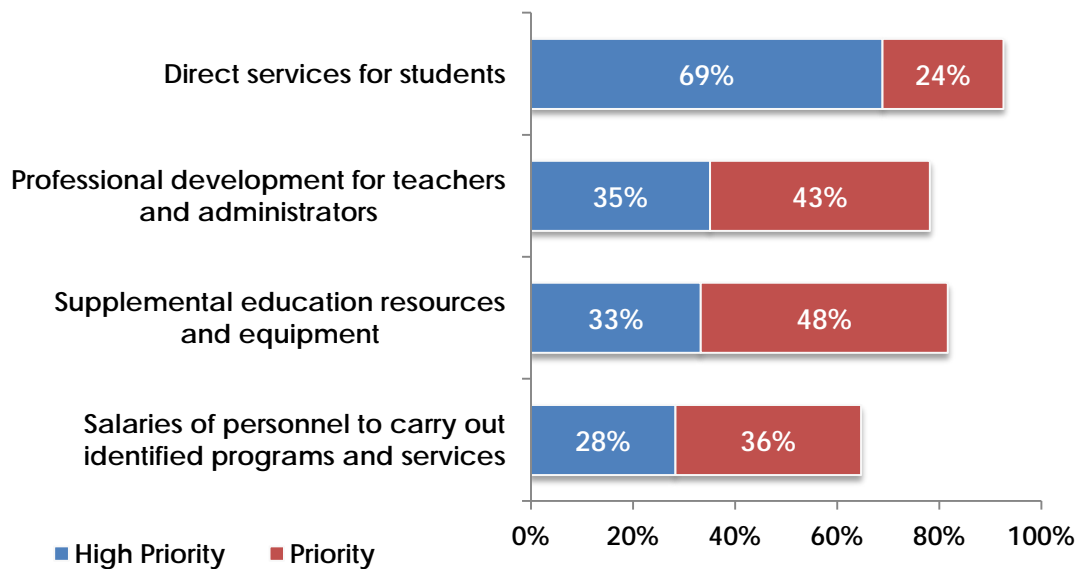| Resource	Very effective	Effective
EL teachers (Teachers specifically trained to work with EL students)	63%	27%
Parents and families	48%	34%
More content teachers (English, Math, Science, etc.)	38%	41%
More administrators (EL specialists, resource teachers, etc.)	21%	42%
Long term ELs (other students)	20%	42%
Central office staff	11%	28%

Student Support and Academic Enrichment

The survey asked respondents to indicate (1) what the priority should be of federal Title IV, Part A funds, which are dispersed to local school systems to provide all students with access to a well-rounded education, improve school conditions for learning, and improve the use of technology to improve the academic achievement and digital literacy of all students. The survey also asked respondents (2) what the priority should be of federal Title IV, Part B funds, which fund the 21st Century Community Learning Centers: out-of/after-school time programs designed to provide students with academic enrichment opportunities as well as additional services to complement the regular academic program.

Almost all respondents (93 percent) indicated direct services for students should be the priority or high priority of Title IV, Part A funds. Many respondents also indicated supplemental education resources and equipment (91 percent) and professional development for teachers and administrators (88 percent) should be the priority/high priority of the funding, as indicated in Figure 15.
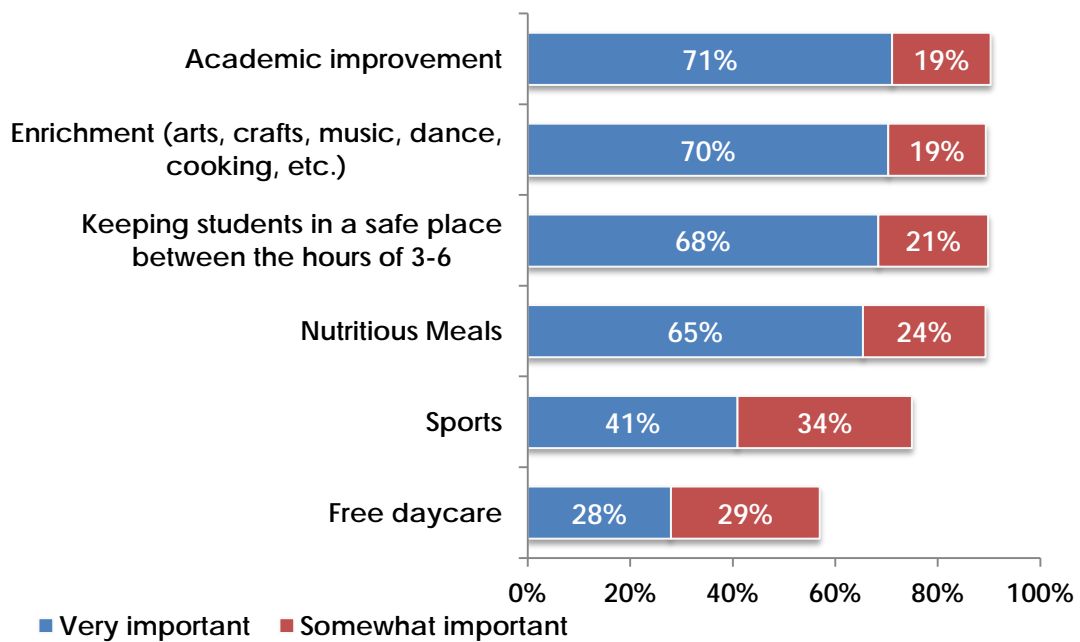
Figure 15. What should be the priority for using Title IV, Part A funds? (190 Responses)

Almost all survey respondents (90 percent) indicated academic improvement as being a very important or somewhat important focus of federal Title IV, Part B funds. Respondents also indicated important foci of 21st Century Community Learning Centers were keeping students in a safe place between the hours of 3 and 6 p.m. (90 percent) and providing enrichment opportunities to students, such as arts, crafts, music, dance, cooking, etc. (89 percent), as indicated in Figure 16 below.

Figure 16. What priorities should after-school programs focus on? (189 Responses)

Overall, the majority of survey respondents responded favorably to MSDE's second draft of its ESSA State Plan. Over two-thirds (68 percent) of respondents indicated they supported or highly supported MSDE's second draft, as indicated in Figure 17 below. These results will be used to inform the final draft of MSDE's ESSA State plan.

Figure 17. What is your level of support for Maryland's ESSA Consolidated State Plan? (187 Responses)
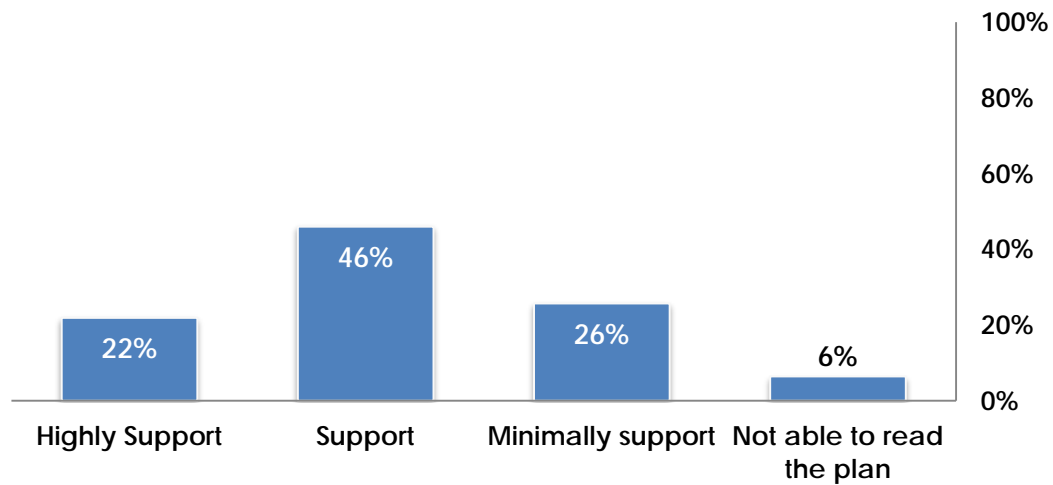
These results will be used to inform the final draft of MSDE's ESSA State plan.
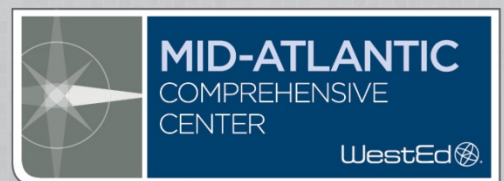
Summary of Feedback Received June 29 to August 10

- 37 letters to State Board/MSDE
  - 7 local school system representatives
  - 10 Maryland education stakeholder groups
  - 12 advocacy or non-profit organizations
  - 4 government or government-related
  - 4 private individuals or others
- 447 online survey responses
  - Approximately 25 percent teachers, 20 percent parents, 17 percent students
  - All school systems represented (greatest number of responses from Prince George's, Charles, Anne Arundel, and Montgomery Counties)
  - 68 percent supportive or highly supportive of Maryland's ESSA plan

Would require adjustments to ESSA plan

1. Details of the summative rating system
2. Definition of chronic absenteeism
3. Expansion of "credit for" and "access to"
4. Selection of indicators to identify Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement Schools (TSI) schools

Other meaningful feedback to ESSA plan

1. Inclusion of growth measures
2. Administration of school climate survey
3. Comparison of schools to demographically similar schools
4. Graduation
5. Other Academic Indicators
6. Consultation

The feedback to MSDE included suggestions for additions, modifications, clarifications, etc. across various other topics of the ESSA plan.

Details of the Summative Rating System

1. **Category descriptors**
   - <u>Feedback:</u> Categories need descriptors in addition to (or in place of) stars.

   - <u>MSDE recommendation:</u> **Add descriptors** of each category, to be developed in consultation with stakeholders. **Retain the star system** for clear communication.

2. **Number of levels**
   - <u>Feedback:</u> Five levels is too similar to an A-F grading system.

   - <u>MSDE recommendation:</u> **Use six levels**, with the lowest level corresponding to CSI schools.

Details of the Summative Rating System: MSDE Recommendation

Symbol	Possible Descriptor (Actual terminology TBD)	Assignment
★★★★★★	Exemplary	Use percentile ranks, with additional criteria such that only schools that truly meet Maryland's standards for excellence would be awarded the top category, and schools in the lowest categories unambiguously fail to meet those standards.
★★★★★	Commendable	
★★★★	On track	
★★★	Underperforming	
★★	TSI	TSI
★	CSI	CSI

Definition of Chronic Absenteeism

1. **Adjustments to definition** ("all students absent greater than 20 days and in membership at the school for at least 90 days")
    - <u>Feedback:</u> Decrease the number of days; do not include legally-excused absences; change from days to percent.

    - <u>MSDE recommendation:</u> **Adjust to align with the federal definition** ("The number of students absent 10% or more school days during the school year" in membership **at least ten days.**

    From federal guidelines: "In accordance with the Office for Civil Rights' guidance, a student is absent if he or she is not physically on school grounds and is not participating in instruction or instruction-related activities at an approved off-grounds location for the school day. Chronically absent students include students who are absent for any reason (e.g., illness, suspension, the need to care for a family member), regardless of whether absences are excused or unexcused.

2. **Medically-fragile students**
    - <u>Feedback:</u> Do not include "medically-fragile students" in chronic absenteeism.

    - <u>MSDE recommendation:</u> **Maintain the federal definition,** which does not count students as absent if they are participating in instruction-related activities at an approved off-grounds location (e.g. home study). Adjust plan language so that this is clear and establish uniform guidelines that will not jeopardize the validity of the chronic absenteeism measure.

Expansion of "Credit for" and "Access to"

1. **Seal of Biliteracy**
   - <u>Feedback:</u> Include Seal of Biliteracy in the high school "Credit for" indicator.

   - <u>MSDE recommendation:</u> **Include Seal of Biliteracy in the high school "Credit for" indicator.**

2. **Expansion of "access to" in middle and high school**
   - <u>Feedback:</u> Add other elements to expand the breadth.

   - <u>MSDE recommendation:</u> **Amend plan language** to indicate MSDE will study the inclusion of additional elements, as long as they meet the requirements of ESSA.

Selection of indicators to identify CSI and TSI schools

1. **Use of achievement and growth only to identify CSI schools**
   - <u>Feedback:</u> Legal and general concerns about not using all indicators. Per latest round of U.S. Department of Education letters and feedback from Maryland's Attorney General, all indicators must be used to identify CSI and TSI schools.

   - <u>MSDE recommendation:</u> Options include using all indicators with the same or different weights - Topic for discussion.

2. **Use of participation to identify TSI schools**
   - <u>Feedback:</u> Do not include participation in TSI criteria.

   - <u>MSDE recommendation:</u> Remove participation from TSI criteria, and add participation to the system of assigning summative rating categories. (For example, category is adjusted for a school that does not meet 95% participation. Or, a school that does not meet 95% participation cannot be an exemplary school.)

Inclusion of growth measures

1. **Student growth percentile as the growth measure**
    *   <u>Feedback:</u> Generally positive and supportive.

    *   <u>MSDE comment:</u> The MSDE understands the critical importance of communication regarding this piece of the accountability system.

2. **Inclusion of growth-to-standard in the growth measure**
    *   <u>Feedback:</u> Mixed. Concerns about: (a) the "double inclusion" of proficiency, which is already part of the academic achievement indicator; (b) negatively contributes to motivation for underperforming schools.

    *   <u>MSDE comment:</u> Plan language will clarify that growth-to-standard will be included only if it demonstrates it would do no material damage.

Administration of School Climate Survey

1. **Suggestions for development and administration of school climate survey**

- <u>Feedback:</u> Some LEAs would like to use the school climate survey for school improvement as well as accountability. LEAs would like to add locally-developed items to the survey.

- <u>MSDE comment:</u> The MSDE is collaborating with the Regional Educational Laboratory and Mathematica to develop a survey that is statistically valid, reliable, and can be used for accountability purposes. Part of the development process will include input from LEAs, with the goal of a multi-purpose useful survey, but MSDE must also ensure that administration of the survey is uniform statewide.

Comparison of schools to demographically similar schools

1. **Schools should be compared to similar schools**

- <u>Feedback:</u> Per the Protect Our Schools Act, schools should be compared to similar schools for information and/or accountability purposes.

- <u>MSDE comment:</u> The MSDE is currently studying a variety of methodologies such that schools can be compared to similar schools in a meaningful, statistically valid way This will be reported, in compliance with the Protect Our Schools Act. (Because ESSA requires a uniform accountability system throughout the state we cannot categorize schools for accountability purposes according to varying subsets of schools.)

Graduation

1. **Removal of five-year-plus-still-enrolled adjusted cohort graduation rate**

- <u>Feedback to States:</u> Only the federal definition of five-year adjusted cohort grad rate is allowable in the "graduation rate" indicator per USED letters to states that included language other than the use of the federal definition.

- <u>MSDE comment:</u> Remove the five-year-plus-still-enrolled adjusted cohort graduation rate from Maryland's definition. Utilize the federal definition of 5-year adjusted cohort graduation.

Other Academic Indicators

1. Use of "other academic indicators" at the high school level:

- <u>Feedback:</u> Using "other academic indicators" at the high school level is not permissible under ESSA.

- <u>MSDE comment</u>: Readiness for Postsecondary success (On-Track 9th grade and Credit for completion of a well-rounded curriculum) is a new Indicator in MD's accountability Plan. MD may expect pushback to move this to School Quality/Student Success. However, the Protect Our School's Act does not allow this. The MSDE has created the new indicator and will be clearer in the Plan about requirements of the State law.

Consultation

1. Addition of Consultation (Appendix F)

- <u>Feedback:</u> Requirement to describe consultation was removed by USED from the template in the revised version

- <u>MSDE comment</u>: Maryland has and will continue to engage stakeholders in the ESSA Consolidated State Plan development and implementation. The MSDE has added Appendix F to the Plan to describe Maryland's consultation with stakeholders in the development of Maryland ESSA Consolidated State Plan.