

BOARD OF EDUCATION OF FREDERICK COUNTY

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Brad W. Young
President

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July 19, 2017

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

RE: Comments on Maryland's Every Student Succeeds Act (ESSA) Consolidated State Plan

Dear Mr. Smarick:

We are very appreciative of the work of the State Board and the staff at the Maryland State Department of Education with regard to Maryland's State Education plan. We have been following your work closely, through the Maryland Association of Boards of Education ESSA Ad Hoc committee. We respectfully offer the following comments on the draft plan posted for public comment on June 29, 2017.

State Accountability System, School Support and Improvement Activities

Academic Achievement Indicators

- We feel strongly that Student Growth Percentage (SGP) be used in a manner that it would serve as an incentive for districts and schools to focus on growth for every student, inclusive of students at both ends of the scale score.
- We have a number of concerns regarding Growth to Target (GTT), also referred to as "Growth to Standard" in some parts of the plan.
 - Using the GTT approach may force schools and school systems to focus resources on only the students below target, and neglect those at target and above.
 - Setting any targets for GTT, as well as setting a trajectory for attaining GTT will take time. Consideration must be given to the fact that the first two years of the Partnership for Assessment of Readiness for College and Careers (PARCC) administration were "no fault" years; the results did not impact a student's ability to graduate. This certainly had an impact on students' perception of the importance of these assessments, and therefore on student performance.
 - Further, initial administration of PARCC assessments was not consistent in terms of modality. Some students completed them using paper and pencil, others took on-line assessments. There were differences in performance that could be correlated with these differences in administration.
 - Finally, FCPS, along with other school systems throughout the state, rolled out new curriculum aligned to the new assessments for different grade bands, at different rates and different times. Professional development was also available and offered across each district according to each system's unique capacity and need. The level of preparedness to take these new assessments varied district to district.

School Quality/Student Success

Survey

FCPS, along with many other school systems throughout the state, has used climate surveys for many years in order to evaluate a variety of things, including student and family engagement, teacher professional development and support, and safety of students, family and staff. The issues we track are linked to our local strategic plan, goals and priorities. We hope that any statewide survey tool can be modified to include our concerns and locally developed questions.

Opportunities/Access to a Well-Rounded Curriculum

- Our students choose a variety of paths upon graduation, and we applaud the inclusion of a specific standard on the Armed Services Vocational Aptitude Battery (ASVAB) as an indicator for readiness for college and career.
- We understand the aspiration to set the academic bar high for students, as well as the sensitivity to providing equity and access to higher-level coursework. However, requiring middle school students to enroll and/or complete a world language and either Algebra I, Geometry, and/or Algebra II is challenging in a schedule that only allows for one or two electives. This puts some students in the position of having to eliminate the pursuit of band/orchestra or the exploration of technical education, for example. Further, the pursuit of algebra and geometry in the middle school years is not developmentally appropriate for some students. We appreciate your eliminating the requirement for these classes from this indicator.
- 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.

Annual Meaningful Differentiation

Our Board appreciates the work toward and consideration given to creating a system that provides a meaningful summative determination and differentiation of school performance. School districts and families look to these determinations to see how their schools are performing and meeting student needs, of course. However, they also should serve as tool to identify areas of future focus and growth and to inform schools and districts of strengths, challenges and needed resources to support students, teachers and families. 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.

Supporting Effective Instruction

Our Board knows the critical role teachers play in the success of our students. We appreciate the attention given to support teachers and to provide professional development aligned to student needs. 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. Effective instruction is rooted in rigorous and relevant teacher preparation and certification. That rigor and relevance should also be carried through the provision of support, professional development and certification renewal.

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Again, thank you for the opportunity to provide comment to the State's draft ESSA Consolidated Plan. We appreciate your diligent work in this endeavor and for your commitment to engaging all stakeholders. We look forward to future opportunities to provide input and share our perspectives and experience as the plan moves forward in the approval process and as it is implemented.

Respectfully,

A handwritten signature in black ink that reads "Brad W. Young". The signature is written in a cursive style with a large, looped "Y" at the end.

Brad W. Young
President

c: Dr. Karen Salmon, State Superintendent of Schools
Dr. Theresa Alban, Superintendent, Frederick County Public Schools
Members, Board of Education of Frederick County