MARYLAND COALITION FOR EQUITY

August 10, 2017

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

Superintendent Salmon and President Smarick:

We are writing on behalf of Maryland education stakeholder groups who have convened in recent months to make educational equity a priority of our collective advocacy. While most of our organizations have submitted our own individual feedback on Maryland's Every Student Succeeds Act (ESSA) Consolidated State Plan, we believe it is important to shine a stronger light on a few aspects of the proposed plan that have an outsized effect on equity in our public schools.

Thank you for your continued commitment to incorporating stakeholder feedback in our state ESSA plan.

Five-Star Ranking System

Our coalition has strong concerns about the unintended effects of a star-based rating system for schools. Most of our lowest performing schools are rooted in communities of concentrated poverty, economic hardship, poor health outcomes, and often higher rates of violent crime. Our kids in these schools need more resources—especially non-academic supports—not punitive labels that further stigmatize the neighborhoods in which they live.

How does labeling a school as a "One-Star School" convince our best educators to work with those students, encourage our strongest principals to lead those buildings, or motivate our parents to have pride in the education of their children? Turning around our lowest performing schools requires a 180-degree shift in culture, built brick-by-brick, based in a commitment for educational excellence. Defining a school by its lack of excellence makes this more challenging right from the beginning of its work to improve. It also can have a negative impact on the quality and value of housing, businesses and other properties in school communities with similar designations, which in turn can impact the amount of resources available from the state and local governments.

Every student deserves a quality public education no matter their zip code. We must communicate our accountability system to the public—especially parents—in more constructive terms if we are to have any chance to deliver on that promise.

Instead of using a star-based rating system, we propose that Maryland adopt a similar system to Illinois: a four-tier system that relies on descriptive terms to communicate school performance. We recommend the following approach:

Tier 1: Exceeds Accountability Target: A school that has no underperforming student group, a graduation rate of greater than 67%, and a percentile score (based on all indicators in the composite score) is 90-100.

Tier 2: Meets Accountability Target: A school that has no underperforming student group, a graduation rate of greater than 67%, and a percentile score (based on all indicators in the composite score) is 51-89.

Tier 3: Underperforms Accountability Target: Any school, except comprehensive support and improvement schools, that has a underperforming student group, or a percentile score (based on all indicators in the composite score) is 6-50. This includes all Targeted Support and Improvement (TSI) schools.

Tier 4: Needs Support and Improvement: Any school that is the lowest performing 5% of Title I schools, a percentile score (based on all indicators in the composite score) is 0-5, or has a graduation rate of 67 percent or less. This includes all Comprehensive Support and Improvement (CSI) schools.

This system works for the following reasons:

- It rewards exceptional schools for being in the top 10% and shines a positive light on our school districts where public recognition is deserved.
- It rewards schools for outperforming the majority of other schools and having equitable educational outcomes and opportunities for all student groups.
- It holds schools accountable if one or more student groups underperform by putting such schools in Tier 3 even if their overall percentile score suggests they should be in Tier 1 or 2. It also holds schools accountable for underperforming the majority of other schools.
- It avoids counterproductive negative labels for bottom performing schools while still accurately communicating to the public that the performance of such schools is unacceptable, and they will therefore receive technical and/or financial support and be expected to improve.
- It establishes the principle that Maryland's accountability system does not serve the purpose of
 publicly shaming schools and the communities they serve. Instead, our system exists to direct
 resources and support to the students who need it most, while accurately and transparently
 informing the public of school performance.

Identification of CSI and TSI Schools

The plan suggests that Maryland only include academic achievement and student growth—both based on PARCC scores—to identify both Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) schools.

Identifying schools for support and improvement based on a single measurement tool denies our students the right to attend schools that are held accountable for providing safe and supportive learning environments, a well-rounded education, career and technology educational opportunities, and strategies that boost parental engagement, student attendance, and graduation rates. We all care deeply about reaching proficiency for every child and closing our persistent achievement gaps. But we believe we must close *opportunity* gaps in order to close achievement gaps. Our students are more than a data point from a test, and therefore, they deserve a school accountability system that is based on more than a test score.

We agree with the other organizations in MSDE's external stakeholder committee in strongly recommending that identification of TSI and CSI schools be determined based on all indicators in Maryland's accountability system.

Communication to Parents and the Public

The ESSA requires all State and Local Education Agencies to provide meaningful participation by all stakeholders (educators, parents, community members, etc.) in the decision-making process of the state and local plans including their development, implementation, review, and oversight. This includes representation, transparency, equity, information, accessibility and feedback.

One of the most challenging aspects of successfully implementing the state ESSA plan will be effectively communicating how our accountability system works to school staff, parents, and the public. Terms like Student Growth Percentiles (SGP) or even proficiency vs. growth are education policy lingo that make engagement and understanding inaccessible for most concerned parents and community stakeholders. We hope MSDE will consider including language in the state plan that describes how the department will work with districts to empower parents and community members to be involved in school improvement and accountability. This should include:

- Conducting focus groups of parents to learn how to explain the accountability system in a way that is inclusive for all members of the public and allows stakeholders to participate in the writing of their school improvement plan.
- Ensuring that all public reporting is available in every language used by Maryland public school parents.
- Providing reporting in both electronic and physical forms.
- Disseminating best practices for how parents and community members can participate in their school's improvement process.

The Maryland Coalition on Equity greatly appreciates the opportunities that MSDE and the State Board has provided for meaningful feedback on the state's ESSA plan. Our organizations are available for further conversations regarding our collective comments.

Sincerely,

Betty Weller President Maryland State Education Association

Joy Schafer President Maryland Association of Boards of Education

Barbara Dezmon, Ph.D. Education Chair Maryland State Conference NAACP

Maritza Solano Director of Education CASA

Bebe Verdery Director, Education Reform Project ACLU of Maryland

Rick Tyler Chair Maryland Education Coalition