



Karen B. Salmon, Ph.D.  
State Superintendent of Schools

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**TO:** Members of the State Board of Education  
**FROM:** Karen B. Salmon, Ph.D. *KBS*  
**DATE:** September 26, 2016  
**SUBJECT:** *Every Student Succeeds Act* (ESSA) Update

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**PURPOSE:**

To provide an update on the work of the ESSA Internal Committee, specifically related to accountability and supporting low performing schools. This update includes feedback from stakeholders, accountability model options, and specific areas for discussion.

**BACKGROUND/HISTORICAL PERSPECTIVE:**

In December 2015, Congress was able to reach bipartisan agreement on an Elementary and Secondary Education Act (ESEA) reauthorization bill and passed the *Every Student Succeeds Act*, signed by President Obama on December 10, 2015. In June 2016, the U.S. Department of Education (USED) began releasing draft regulations to provide further guidance on the new law. The Maryland State Department of Education (MSDE) ESSA Internal and External Committees along with subcommittees are working to complete a draft of the Maryland Consolidated State Application for submission to the U.S. Department of Education by March 6, 2017 or July 5, 2017 (submission date is yet to be decided).

**EXECUTIVE SUMMARY:**

The charge of the ESSA Internal Committee is to provide guidance on the transition from ESEA to ESSA, provide recommendations to the ESSA External Stakeholder Committee, the State Superintendent, and the State Board on Maryland's ESSA Plan, and create a draft of the State Plan Components.

The update on accountability will include input on ESSA from the Maryland Education Association (MSEA), a review of accountability components, accountability model options, and an in-depth discussion of recommendations of a model for Maryland's Accountability Plan.

The update on school improvement will include a summary of feedback from stakeholders on how to support low achieving schools, the ESSA requirements around low performing schools, and an explanation of available funding and resources to support school improvement.

**ACTION:**

For information only.

## Every Student Succeeds Act (ESSA)

### Options for Non-Academic Indicators

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ESSA requires states to measure School Quality or Student Success for all public schools

- Indicator(s) must be disaggregated by student group
- Indicator(s) may differ by each grade span
- Indicator(s) may include one or more measures of:
  - Student access and completion of advanced coursework
  - Postsecondary readiness
  - School climate and safety
  - Student engagement
  - Educator engagement

Some options may include (some options may fit under multiple categories):

- ❖ School and/or Student Options:
  - School Facility Quality
  - Chronic Absenteeism
  - Suspension/expulsion Rates
  - Surveys to measure engagement
  - Achievement Advancement (PL 1 to 2 and PL 4 to 5)
  - College and Career Readiness
  - Access to a full curriculum – including science, social studies, arts, as well as reading and mathematics
  - Availability of and participation in rigorous courses (AP/IB)
  - School Climate – evidence from student and staff surveys about school offerings, instruction, academic, social-emotional supports, trust, belonging
  - Availability of curriculum materials, technology resources
  - Ratios of students, counselors, and specialists to students
  - Indicators of engagement of parents
  
- ❖ Teacher Options:
  - Teacher Qualification
  - Access to and participation in PD
  - Climate Survey
  - Indicators of participation/engagement



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July 29, 2016

Ms. Meredith Miller  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 3C106  
Washington, DC 20202-2800

Docket ID: ED-2016-OESE-0032

Dear Ms. Miller:

The Maryland State Department of Education (CDE) submits the following comments on the Department of Education's (Department) Notice of Proposed Rulemaking (NPRM) on accountability and State plans under the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA), Docket ID ED-2016-OESE-0032, published on May 31, 2016. The State of Maryland has a reputation for excellence in education and a long history of systems of accountability for school and student performance. Maryland's mission is to provide every student with a world-class education that ensures readiness for college and careers.

Overall, the proposed regulations appear to strike an appropriate balance between providing states and local school systems with the flexibility needed to implement ESSA in a manner that recognizes individual state and local circumstances, while providing guardrails to ensure the law leads to a better education for all students. While we commend the overall approach taken in the regulations, and many of the individual provisions, there are a few provisions that we believe need to be revised before the regulations are finalized. We request the Department give serious consideration to the issues described below.

### **1. Timeline for Implementation of New Accountability Systems**

The proposed regulation requires states to make their initial identification of schools for support and improvement before the beginning of the 2017-18 school year using data from the 2016-2017 school year, which could be averaged with earlier data. This means Maryland would be identifying schools for improvement using an old accountability system, rather than the new accountability system we are currently developing that embraces the flexibility provided by ESSA and fully considers the valuable input being received from stakeholders through the considerable consultation requirements of ESSA. Maryland is making every attempt to submit its ESSA application by the first deadline of March 6, 2017. Considering the 120-day turnaround for approval of our state ESSA plan, we may not receive approval until the beginning

of July 2017. In order to take full advantage of the flexibility provided in ESSA, our new accountability system may include data points that we do not currently collect from our LEAs. Those data collection systems would need to be put in place during the 2017-2018 school year. Therefore, we would be unable to identify schools for improvement using our new ESSA accountability system until late summer following the 2017-2018 school year (before the beginning of the 2018-19 school year).

We understand the urgency of supporting schools that are most in need of improvement, as many of the schools states are serving had been identified using data that has become outdated. However, Maryland recently identified a new list of priority and focus schools for the 2016-2017 school year given the flexibility provided by the Department to ESEA Flex States in ESEA Renewal. To identify another list of schools for comprehensive support and improvement for school year 2017-2018 that is not based upon the new accountability system, and then a third list of schools for comprehensive support and improvement for the 2018-2019 school year using the new accountability system does not seem reasonable and would cause tremendous confusion in our school communities.

We recommend the Department permit states the option to delay identifying new schools for comprehensive support and improvement until the beginning of the 2018-19 school year, and to continue their improvement efforts in currently identified schools until that time.

## **2. Timing of Cohort Graduation Rate Data**

Related to the request to delay the identification of schools for comprehensive support and improvement is a request to add clarifying language that permits states to utilize “lagged” cohort graduation rates for the identification of high schools with graduation rates less than 67 percent. Maryland counts as graduates for a particular cohort, those students who completed their high school graduation requirements during the summer immediately following their senior year. There is not sufficient time for MSDE to receive this data from local school systems and verify its accuracy prior to the beginning of the next school year. Therefore we are unable to identify high schools with cohort graduation rates less than 67 percent for the immediate preceding year. While the regulations permit an averaging, they do not specifically provide for the use of “lagged” data.

We recommend the Department include specific language in the regulations permitting states to use “lagged” cohort graduation rates to identify, for comprehensive support and improvement, high schools with graduation rates less than 67 percent.

## **3. Four-Year Cohort Graduation Rate for Identification of Low-Performing Schools**

As noted above, ESSA requires that SEAs identify, for comprehensive support and improvement, any public high school that graduates less than 67 percent of its students. While the law does not specify a particular methodology to be used in calculating graduation rates for

school identification, the proposed regulations would require that all states use the four-year adjusted cohort rate.

This proposed requirement would disproportionately impact high schools set up specifically to enroll certain at-risk student populations including returning dropouts, adjudicated youth, and other groups who, by their nature, need additional time to finish school. Under the proposal, all of these schools would likely fall into comprehensive improvement status, not because of their educational performance but because of the student populations they serve.

The Department recognized the need for flexibility in this area when, under the 2008 Title I regulations, it allowed states to use both the four-year adjusted cohort rate and an extended-year adjusted cohort rate in their accountability systems. Congress implicitly endorsed that decision in ESSA by permitting states to use both rates in their long-term goals, interim measures of progress, and annual indicators.

We recommend that states be allowed to use both the four-year adjusted cohort rate and an extended-year adjusted cohort rate in their identification of schools for Comprehensive Support and Improvement.

#### **4. Disaggregation of School Quality Indicators**

Section 1111(c) of ESSA requires state accountability systems to include at least one “indicator of school quality or student success...” One specific measure that may be included is “student access to and completion of advanced coursework.” Section 200.14(b)(5)(i) of the proposed regulations also lists “student access to and completion of advanced coursework” as an indicator of school quality or student success. In consultation with Maryland education stakeholders, there seems to be an interest in including access to advanced coursework, as well as student access to other resources considered important for student success (such as the availability of school counselors, psychologists, a full array of course offerings in the arts, etc.) in the state’s accountability system. However, student access to various resources as a measure of school quality does not lend itself to disaggregation by student subgroup. These measures are associated with individual schools, but not necessarily with individual students.

We recommend that the Department permit states to include in their accountability systems important measures of school quality that cannot necessarily be disaggregated by student subgroup, such as student access to the resources considered necessary for student success.

#### **5. Requirements for the Consolidated State Plan**

While MSDE is generally supportive of the proposed regulations in the area of accountability, we have concerns with the proposed requirements for the consolidated state plan. ESSA clearly specifies that, in establishing requirements for the consolidated state plan, the Secretary may “require only descriptions, information, assurances..., and other information that are *absolutely necessary* for the consideration of the consolidated application.”

However, in the proposed regulations the Department has proposed adding numerous, burdensome requirements that seem to go well beyond what is absolutely necessary. Some examples of this include:

- Under proposed Section 299.14(c), the SEA would be required to describe its performance management system for “each component required” under Sections 299.16 through 299.19. Each of these descriptions must include six discrete elements. Because sections 299.16 through 299.19 include some 40 different components (individual requirements), it appears that the states would have to include 240 separate descriptions of their performance management systems, as well as additional performance information required under Sections 299.17(e) and 299.19(b). None of these descriptions is required under the statute.
- While the law requires SEAs to describe how low-income and minority children in Title I schools are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers, and to describe how they will report on and evaluate the state’s progress in this area, the proposed regulations would go well beyond the statutory language, calling for new definitions and reporting timelines that are different from those included in the proposed annual report card requirements. Another aspect of the proposed regulations that goes beyond the statutory language includes the requirement to conduct “root cause analyses” of the disproportionality. We appreciate the Department’s desire to have states continue the progress they have made under their teacher equity plans, but building so much (sometimes confusing) detail into the regulations is unnecessary and overly prescriptive.
- Under section 299.19(a)(ii), the SEA’s description of how it will support a well-rounded and supportive education for all students would be required to include the state’s strategies (and the rationales for those strategies), timelines, and funding sources for providing equitable access to rigorous courses in 17 separate subject areas, as well as in other subjects in which female students, minority students, English learners, children with disabilities, and low-income students are underrepresented. There is no statutory requirement for this description of this plan in general, and much less so for a requirement to provide four types of information on at least 17 subjects.
- Under proposed section 299.19(a)(3), the plan would be required to include a review, *on an LEA-by-LEA basis*, of districts’ budgeting and resource allocations in four separate areas. There is no requirement to include a review in the statute.

We recommend that the Department take an approach consistent with Congressional intent allowing states to submit streamlined plans that capture essential, required elements, without adding planning requirements that go beyond what is called for in the statute.

The Maryland State Department of Education appreciates the opportunity to comment upon the proposed regulations. We urge the US Department of Education to give our recommendations serious consideration in promulgation of the final regulations.

Best Regards,

A handwritten signature in blue ink that reads "Karen B. Salmon, Ph.D." The signature is written in a cursive style.

Karen B. Salmon, Ph.D.  
State Superintendent of Schools

# PUBLIC SCHOOL SUPERINTENDENTS' ASSOCIATION OF MARYLAND

David A. Cox, Ph. D., President PSSAM  
Superintendent of Schools  
Allegany County Board of Education  
108 Washington Street  
P. O. Box 1724  
Cumberland, MD 21501-1724  
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August 1, 2016

Dr. John B. King, Jr.,  
Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Secretary King,

On behalf of the Public Schools Superintendents' Association of Maryland, consisting of all local 24 school superintendents, I am writing today in response to the US Education Department's proposed regulations related to accountability and state plans for the Every Student Succeeds Act (ESSA). I welcome the opportunity to provide this feedback and look forward to the department's response, in the hope that the final rule reflects the feedback of the diverse group of stakeholders weighing in on the topics.

Maryland is considered one of the nation's wealthiest states and yet approximately 50% of the students we serve in our public school systems are receiving free or reduced meals. Our close proximity to Washington, D. C. accounts for our ever growing ELL population during the past several years. Of the almost one million students we serve in Maryland, over 10% require special education services. In an effort to continue to provide leadership for the success of all our students in Maryland, we are urging you to NOT think in terms of one size fits all in the nation and to provide each state with the flexibility it needs to address their diverse populations.

The proposed regulations I am responding to today are a mixed bag, with the department exercising restraint in some instances while overreaching on others. The power of ESSA is the flexibility it provides to states and to schools allowing them to focus on each student. The ESSA environment promises to be in stark contrast to the prescriptive and restrictive 'one size fits all' landscape of No Child Left Behind (NCLB). In considering the Department's proposal, it is as much about each individual element as it is collective impact. I am mindful of the fact that collectively, the pressures put in place by USED regulations on accountability increase the likelihood that the changes implemented by state and local education agencies will be more peripheral than significant, just tweaking existing programs rather than fully rethinking their approach. Unnecessarily rigid regulations may hinder the very state and district innovation that we know is needed to serve our underserved students.

- **N-Size:** USED proposes to leave the n-size determination up to the state, unless the state wants to go above 30, in which case the state will have to justify a larger n-size. This is a compromise position beyond which USED must not stray. The proposal, as it stands, means that if more than 2 students are absent on testing day, the school would be out of compliance. USED must not issue any further guidance and could consider refraining from any regulation on this topic at all, as ESSA statute was clear in its assertion that this is a decision to be left to the states.



- **95 Percent Participation:** ESSA maintains the requirement that 95 percent of students take the tests. USED's proposed regulations leave it up to the states to determine how to respond to/cope with schools that do not reach the threshold, and require states to take serious action, but stop short of federal prescription about what that action/consequence might be. While this could be perceived as a higher level of prescription than ESSA intended, it is something that can be worked with, and I urge USED to issue no additional regulations on this topic.
- **Summative Indicator:**  
We are strongly opposed to USED's regulation (200.18) that requires the state plan to include one summative rating from at least three distinct rating categories for each school. The statute requires evaluation of LEAs and schools on academic and non-academic factors, but stopped short of requiring each to be rated by a single indicator. The statute's clear step away from reducing a school to a single letter or number score is important and provides flexibility and support for more nuanced state and district reporting, including the use of data dashboards. Reliance on a summative indicator mirrors current reporting requirements, blurs the nuance that comes from multiple and varied indicators, unnecessarily hinders the ability of state and local education agencies to consider new approaches and increases the likelihood of states just maintaining the status quo of the broken NCLB. Why are we trying to reduce what should be a fair and comprehensive picture of schools to a single score? USED should ensure that states retain the flexibility to develop their own weighting systems, including the weight of individual factors. States must have the flexibility to choose among and report on multiple academic and non-academic factors that provide educators, parents, and stakeholders responsible for helping students and improving schools with relevant information. Let the states do what they were tasked to do: take responsibility for building transparent and fair accountability systems.
- **Timeline for Implementation for Comprehensive Supports:** We are opposed to the proposed regulation that would require all SEAs to identify LEAs in need of support/improvement for the *start* of the 2017-18 school year. It is very likely that states may not have their accountability plans finalized until well into the 2016-17 school year. This unnecessarily rushed timeline creates a scenario whereby a school in the first year of ESSA implementation will be labeled as needing support based on 2016-17 data, which is NCLB data. Given that 2017-18 is the first year of ESSA implementation, it follows that identification under ESSA would come only after ESSA-related data has been collected, at the end of the 2017-18 school year for use during the 2018-19 school year. I am concerned this proposal creates uncertainty as state and local education agencies may be unclear about which data is shaping their accountability status for 2017-18 (NCLB or ESSA?). I am concerned that this proposal, like the summative indicator, increases the likelihood that states maintain the status quo or, at best, implement only minor or peripheral changes to their systems. Instead, USED should treat the 2017-18 school year in a manner consistent with how it treated the 2016-17 school year after ESEA waivers expired, and freeze accountability ratings/labels.
- **Foster Child Transport:** We are strongly oppose USED's proposed regulation as it relates to the transportation of foster children. The USED proposal deems that when it comes to transporting children in foster care, if the child welfare agency and district cannot reach an agreement the LEA is fiscally liable to cover transportation costs. I agree with the right of students in foster care to have transportation to their school of origin, but finds that USED's proposed regulation is an egregious overreach in direct conflict with the underlying statute. The ESSA statute requires a collaborative approach between child welfare agencies and LEAs and provides that if there are additional costs for transporting students in

foster care, the district "will provide transportation" for the child if the local child welfare agency agrees to reimburse the local educational agency for the cost of such transportation; if the local educational agency agrees to pay for the cost of such transportation; or if the local educational agency and the local child welfare agency agree to share the cost of such transportation. It does not identify any specific entity as fiscally liable. USED's proposal directly undermines the collaborative, carefully negotiated language in ESSA and reduces the responsibility of the child welfare agency to meaningfully engage in discussions with the LEA. USED regulation in this area is unnecessary beyond simply underscoring that the LEA will provide transportation only in the three specified instances.

Thank you for the opportunity to provide feedback on this regulatory proposal. In Maryland, we look forward to seeing the process move forward. Should you have any further questions, please contact me at david.cox@acps.k12.md.us or my cell phone at: 301-697-9048.

Sincerely,

A handwritten signature in blue ink, appearing to read "David A. Cox".

David A. Cox, Ph.D.,  
President PSSAM  
Superintendent of Schools  
Allegany County Public Schools

# Maryland Association of Boards of Education



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Phone (410) 841-5414 • (800) 841-8197 • Fax (410) 841-6580

August 16, 2016

Dr. Karen B. Salmon  
State Superintendent of Schools  
Maryland State Department of Education  
200 West Baltimore Street  
Baltimore, MD 21201-2595

Dear Dr. Salmon:

We are writing on behalf of the Maryland Association of Boards of Education (MABE), representing all twenty-four local boards of education, regarding the State's implementation of the Every Student Succeeds Act (ESSA). In partnership with the State Board of Education, as the governing bodies empowered to adopt public education policies in the State, MABE and the local boards we represent know that robust community engagement is essential to our common success. Therefore, MABE appreciates the formation of the ESSA Stakeholder Committee; and believes that local boards and educational organizations benefit from MSDE's process of reporting to, and seeking input from, these key partners and stakeholders.

In this context, MABE requests the following actions to help ensure the successful development and implementation of Maryland's ESSA Plan. First, MABE requests that the ESSA Stakeholder Committee continue to meet throughout the implementation of ESSA; to extend beyond the spring of 2017 when the State Plan must be submitted to the U.S. Department of Education and continue to meet and gather input through the 2017-2018 school year.

Second, MABE requests that the membership of the Stakeholder Committee be expanded to include all interested parties. MABE appreciates being represented on the Stakeholder Committee by Ellen Flynn Giles, and knows that other groups are interested in being more fully engaged in the process. Recognizing the challenge to manage the work of an expanded committee, MABE suggests the formation of subcommittees to facilitate more thorough discussions and exploration of the many complex policy issues arising under ESSA.

Third, MABE requests the State's support for an extended ESSA implementation timeline, including: 2016-2017 as a transition year; 2017-2018 as the first year for collecting school data under a new state accountability system, and 2018-2019 being the first year schools would be identified as needing supports and improvements based on these new standards. We request that MSDE and the State Board adopt a State Plan and proceed in a manner that engages local boards over multiple school years to reform Maryland's school performance accountability system. Currently, Congress and the U.S. Department of Education are debating the scope of regulations regarding local and state report cards, methods for calculating student achievement, and the identification of schools for targeted support and school-wide improvement. These and other issues warrant a prudent approach to adopting reforms at the state and local levels.

MABE is committed to collaborative involvement in Maryland's consideration of the optimal ways in which ESSA can benefit our students. Local boards know that our educators, parents, students, and many other educational and community partners are counting on us to do so. Toward this end, MABE has formed an Ad Hoc Committee on ESSA to provide a forum for members of local boards to discuss and recommend MABE positions on issues pertaining to ESSA. As MABE continues this work, we offer any assistance that we may provide MSDE and the State Board of Education.

We look forward to hearing from you regarding our specific requests and to our collaboration on the successful implement of ESSA and the continuous improvement of our education efforts on behalf of all of Maryland's students.

Sincerely,



Brig.Gen.(Ret.) Warner I. Sumpter  
President



Joy Schaefer  
Secretary and Ad Hoc  
ESSA Committee Chair

WIS:JS:kwb

Copy:

Andrew R. Smarick, State Board President  
MABE Board of Directors  
Board Presidents/Chairs  
Superintendents of Schools/Chief Executive Officers  
ESSA Ad Hoc Committee Members  
Renee M. Spence, PSSAM Executive Director  
Frances Hughes Glendening, MABE Executive Director



Karen B. Salmon, Ph.D.  
State Superintendent of Schools

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August 29, 2016

Brig. Gen. (Ret.) Warner I. Sumpter  
President  
Maryland Association of Boards of Education  
621 Ridgely Avenue, Suite 300  
Annapolis, MD 21401-1112

Joy Schaefer  
Secretary and Ad Hoc ESSA Committee Chair  
Maryland Association of Boards of Education  
621 Ridgely Avenue, Suite 300  
Annapolis, MD 21401-1112

Dear Brig. Gen. Sumpter and Ms. Schaefer:

I am in receipt of your letter dated August 16, 2016 regarding actions related to the Every Student Succeeds Act (ESSA). I appreciate your support and partnership in working with the Maryland State Department of Education (MSDE) as we collaborate with stakeholders to develop Maryland's ESSA Consolidated State Plan. I would like to respond to some of your recommendations and let you know the actions that we are taking and the process we have planned moving forward.

As you are aware, we have established an ESSA External Stakeholder Committee. Meetings are planned for this group to continue to meet through this 2016-2017 school year and we are committed to work with the Committee through the implementation year in 2017-2018. The membership of the External Committee has been expanded and now includes 31 members. The membership of the Committee is broad based and we ask that members of the Committee reach out to their constituency, sharing information and gathering input. We have met with more than 40 stakeholder groups and we have additional focus groups planned to gather input on recommendations. All input is shared with the seven subcommittees that are working to develop Maryland's draft plan.

Maryland has submitted input to the U. S. Department of Education on the draft Accountability regulations and will continue to share the needs of Maryland on behalf of our students as we proceed in this work. This input includes a recommendation to extend the implementation timeline. Although Maryland will abide by whatever decision is reflected in the adopted regulations, we share the same concern about the implementation timeline and agree that it should be the first year of implementation of the new accountability system (2017-2018) that should inform the identification of comprehensive and targeted support schools in school year 2018-2019.

Brig. Gen. Sumpter  
Ms. Schaefer  
August 29, 2016  
Page 2

Additionally, we will continue to review and discuss possible dates for the submission of Consolidated State Plans.

MSDE applauds the creation of your Ad Hoc Committee on ESSA and looks forward to receiving any recommendations that are developed on issues pertaining to ESSA. Thank you again for your collaborative and important suggestions and recommendations to us.

Best Regards,

A handwritten signature in black ink that reads "Karen B. Salmon, Ph.D." The signature is written in a cursive style with a large initial 'K'.

Karen B. Salmon, Ph.D.  
State Superintendent of Schools

KBS/mlg

# **Every Student Succeeds Act (ESSA)**

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**State Board Meeting  
September 26, 2016**

# Objectives

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- Gather and discuss stakeholder input on ESSA
  - Maryland State Education Association (MSEA)
- Discuss draft accountability indicators and models (aggregations, calculations, and classifications)
- Discuss interventions for supporting low performing schools



# Consolidated State Plan

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- Consultation and Coordination
- Challenging Academic Standards and Assessments
- **Accountability, Support, and Improvement for Schools**
- Supporting Excellent Educators
- Supporting All Students

# ESSA Timeline Review

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- ❑ September 26 and 27, 2016 State Board Update
- ❑ October 20, 2016 ESSA External Stakeholder Meeting
- ❑ October 25, 2016 State Board Update
- ❑ December 5, 2016 State Board Update
- ❑ December 15, 2016 ESSA External Stakeholder Meeting
- ❑ January 24, 2017 State Board Update
- ❑ February 16, 2017 ESSA External Stakeholder Meeting
- ❑ February 28, 2017 State Board Update
- ❑ March 28, 2017 State Board Update
- ❑ April 25, 2017 Final Draft to State Board
- ❑ April 27, 2017 ESSA External Stakeholder Meeting
- ❑ April 28, 2017 Submission of Plan to Governor, Legislative Policy Committee and Public Comment (30 days)
- ❑ May 23, 2017 State Board Update
- ❑ June 27, 2017 Final Approval by the State Board
- ❑ **July 5, 2017 Submission to U.S. Department of Education**

# Trade-Offs in Design

Simplicity for the sake of transparency



Complexity for the sake of multiple facets

Goals based on current performance



Aspirational goals

Limited targets (summative level)



Multiple targets (at summative level)

Single summative rating



Multiple summative ratings



No summative rating

Indicators for reporting



Indicators for accountability

Single year



Multiple year

Inputs



Outcomes

Status



Improvement

# Indicators



## Elementary/Middle Schools

**Indicator**  
Achievement

**Indicator**  
Progress/Growth

**Indicator**  
English Learner  
Proficiency

**Indicator**  
School Quality/Student  
Success

## High Schools

**Indicator**  
Achievement

**Indicator**  
Graduation

**Indicator**  
English Learner  
Proficiency

**Indicator**  
School Quality/Student  
Success

# Types of Aggregation

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There are 4 main ways that states can aggregate the group of indicators that make up the state's system for annual determinations:

- Dashboard
- Index
- Goal-Based
- Matrix

# Example Dashboard: Elementary/Middle

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## Achievement Indicator

Performance (Proficiency)

- ✓ Mathematics
- ✓ ELA
- ✓ Science

\* *Performance (Index)*



## English Language Indicator

Performance (Proficiency)

- ✓ Progress in achieving English Language



## Progress Indicator

Growth

- ✓ Mathematics
- ✓ ELA

\* *Change in Low and/or High Status*



## Non Academic Indicator

- ✓ Chronic Absenteeism
- ✓ Suspension
- ✓ Climate

# Example Dashboard: High School



## Achievement Indicator

Performance (Proficiency)

- ✓ Mathematics
- ✓ ELA
- ✓ Science
- ✓ \* *Performance (Index)*



## English Language Indicator

Performance (Proficiency)

- ✓ Progress in achieving English Language



## Graduation Indicator

- ✓ 4-Year Cohort
- ✓ 5-Year Cohort



## Non Academic Indicator

College Career Readiness

- ✓ (CTE) Concentrators
- ✓ Enrollment in Postsecondary
- ✓ Dual Enrollment
- \* Climate

# Type of Aggregation - Dashboard

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- ❖ Benefits:
  - Can maximize transparency of performance on individual measures and minimize performance threshold decisions
  - Allows the stakeholder to determine their own values about the data
- ❖ Limitations:
  - Difficult to interpret overall performance across schools
  - Difficult for educators/administrators to understand why a specific school was identified in a federal improvement category
  - Effective communication with dashboards takes considerable design work.
- ❖ Key Considerations:
  - Current regulations require summative rating
  - Another aggregation approach “behind the scenes” would be used to identify comprehensive and targeted support and intervention schools.
- ❖ Example states: IL



# Example - Index

Indicator/Measure	Elementary/Middle		High	
	Weight	Points	Weight	Points
<b>1 Academic Achievement</b>	<b>25%</b>	<b>100</b>	<b>25%</b>	<b>100</b>
Proficiency ELA	7.5	30	7.5	30
Proficiency Math	7.5	30	7.5	30
Proficiency Science	5	20	5	20
Proficiency Social Studies	5	20	5	20
<b>2 Progress</b>	<b>25%</b>	<b>100</b>		
Growth ELA	12.5	50		
Growth Math	12.5	50		
<b>3 Graduation</b>			<b>25%</b>	<b>100</b>
4-Year Cohort Graduation Rate			12.5	50
5-Year Cohort Graduation Rate			12.5	50
<b>4 English Language Proficiency</b>	<b>25%</b>	<b>100</b>	<b>25%</b>	<b>100</b>
English Language Proficiency	25	100	25	100
<b>5 Non-Academic (H)</b>			<b>25%</b>	<b>100</b>
Meet CCR (AP, IB, SAT, ACT, Dual, Accuplacer)			25	100
<b>6 Non-Academic (E/M)</b>	<b>25%</b>	<b>100</b>		
Climate	12.5	50		
Chronic Absenteeism	12.5	50		
Total	100%	400	100%	400

# Maryland School Progress Index

## Grades PreK-8

Meeting Performance Targets (AMO)

**Achievement\***

30%

- 33.3%- Mathematics Proficiency (MSA)
- 33.3%- Reading Proficiency (MSA)
- 33.3%- Science Proficiency (MSA)

**Gap\***

40%

Gap between *lowest* subgroup and *highest* subgroup within a school:

- 33.3%- Mathematics Proficiency (MSA)
- 33.3%- Reading Proficiency (MSA)
- 33.3%- Science Proficiency (MSA)

**Growth\***

30%

Percent of students making one year's growth:

- 50%- Mathematics Proficiency (MSA)
- 50%- Reading Proficiency (MSA)

## Grades 9-12

Meeting Performance Targets (AMO)

**Achievement\***

40%

- 33.3%- Mathematics Proficiency (Algebra/ Data Analysis HSA)
- 33.3%- English Proficiency (English HSA)
- 33.3%- Science Proficiency (Biology HSA)

**Gap\***

40%

Gap between *lowest* subgroup and *highest* subgroup within a school:

- 20%- Mathematics Proficiency (Algebra/ Data Analysis HSA)
- 20%- English Proficiency (English HSA)
- 20%- Science Proficiency (Biology HSA)
- 20%- Cohort Graduation Rate
- 20%- Cohort Dropout Rate

**College-and Career-Readiness\***

20%

- 60%- Cohort Graduation rate
- 40%- College and Career Preparation (CCP)
  - Advanced Placement or International Baccalaureate
  - Career and Technology Education (CTE) Concentrators
  - Enrollment in Technical School



\*ALT-MSA is included in the index component

# Type of Aggregation - Index

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- ❖ Benefits:
  - Simple to understand
  - Maximize differentiation and clarity of rating thresholds
- ❖ Limitations:
  - Minimize transparency of performance on individual measures
  - May be difficult to weight appropriately
- ❖ Key Considerations:
  - Policy “weights” may not match numerical weights
  - Unintended consequences since performance thresholds can be set for individual metrics and/or overall
  - Performance thresholds can be normative or criterion-based
- ❖ Example states: DE, KY, NM, FL, WV

# Example Goal Based

Measure	Performance	Goal	Status
Proficiency ELA	61%	60%	Meets
Proficiency Math	49%	60%	Does not Meet
Proficiency Science	72%	70%	Meets
Progress in EL Proficiency	30%	50%	Does not Meet
Growth in ELA	Above Avg	Average	Meets
Growth in Math	Above Avg	Average	Meets
4-Year Grad Rate	81%	83%	Approaching
5-Year Grad Rate	86%	85%	Meets
CCR	55%	35%	Exceeds
Climate	20%	25%	Does not Meet

# Type of Aggregation – Goal Based

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- ❖ Benefits:
  - Simple to understand
  - Historical precedence
  - Can take advantage of new predictive analytic models
- ❖ Limitations:
  - Can narrow focus on improvement to students near benchmark
  - May discourage schools far from the benchmark
- ❖ Key Considerations:
  - Negative historical connotations may discourage innovation
  - Proposed regulations require at least 3 performance levels, which increases the number of decisions about the “appropriate” level of performance and whether/how that differs for different schools or student populations.
- ❖ Example states: pre-waiver NCLB, TN and CT are a mix of Goal and index

# Example Matrix

## Status

Indicator Results = High

Achievement

Graduation Rate

Non-Academic



## Progress

Indicator Results = Low

Growth

EL Progress



Status	High	Yellow	Green	Blue
	Mod	Orange	Green	Green
	Low	Red	Orange	Orange
		Low	Mod	High
		Progress		

# Type of Aggregation - Matrix

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- ❖ Benefits:
  - Transparent information about both current performance and improvement
  - Can better reflect the policy values of the accountability system
- ❖ Limitations:
  - Difficult to explain to stakeholders and few examples exist
  - Harder to establish federal school classifications
- ❖ Key Considerations:
  - Must decide which indicators fit into which domain
  - Establishing cut lines requires agreements regarding accountability system values
  - Proposed regulations requiring each measure to have a performance designation of at least 3 levels can complicate the communication of a matrix.
- ❖ Example states: CA (mix of goal and matrix)



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# Supporting Low Performing Schools



# Sample Stakeholder Feedback on Supporting Low Performing Schools

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- Need a consistent menu of supports
- Need more vertical articulation and collaboration among Title I, II, III and IV
- Need fewer, but strong, supports which are implemented with fidelity
- Should allow for mid-course corrections and flexibility when something is not working
- Strategies should include: Modeling, coaching, building relationships, and building capacity

# School Improvement

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- **Past support-** Race to the Top grant was used to provide additional support to low performing schools
- **Present-** New schools were identified for 2016-2017 and are being provided support from Title I and the Low Performing Schools Team
- **Future-** Determine supports and interventions for low performing schools

# Comprehensive Support and Improvement (CSI) Schools

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- Identified based on a system of meaningful differentiation:
  - Not less than lowest 5 percent (Title I) schools
  - **ALL** public high schools failing to graduate one-third or more students
  - Schools with chronically low performing groups of students that have failed to improve after implementing more targeted supports (Title I)
- Beginning 2017-2018\*
- Once every three years

# Comprehensive Support and Improvement

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- States approve and monitor LEA plans for Comprehensive Support and Improvement Schools
- LEA plans must:
  - Be informed by all accountability indicators, including performance against state-set long-term goals;
  - Include evidence-based interventions;
  - Be based on a school-level needs assessment;
  - Identify resource inequities; and
  - Be approved by the school and LEA.

# Targeted Support and Improvement (TSI) Schools

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- Must be identified using State's system of annual meaningful differentiation
  - Schools with subgroups of students who are consistently underperforming
    - Consistently underperforming determined by State
  - Schools with a subgroup performing as low as the bottom five percent of Title I schools
- Beginning 2018-2019
- Annual Identification

# Targeted Support and Improvement

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- ❑ LEAs approve and monitor school plans for Targeted Support and Improvement Schools
- ❑ School plans must:
  - Be informed by all accountability indicators, including performance against state-set long-term goals
  - Include evidence-based interventions
  - Result in additional action if implementation of the plan is unsuccessful after a number of years to be determined by the LEA

# Exit Criteria – Comprehensive and Targeted Schools

## Comprehensive Schools

- State must determine exit criteria, number of years to meet criteria
  - State determined amount of improvement
    - Can not exceed more than four years
    - Must increase student outcomes
    - Must no longer meet the definition for comprehensive support
  - More rigorous action
    - Needs Assessment
    - Amend support and improvement plan

## Targeted Schools

- LEA must determine exit criteria
  - LEA determined amount of improvement
    - Must increase student outcomes
    - Must no longer meet the definition for comprehensive support
    - For those with low participation rates- requires increase in participation
  - More rigorous action
    - Amend support and improvement plan
    - LEA must increase monitoring and support

# Differentiated Supports and Interventions

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- Ensure Evidenced Based Interventions
  - Develop a process for intervention plan approval
  - Establish a monitoring process with focus on implementation fidelity
  - Consider resource allocations
  - Identify SEA supports for Comprehensive Support & Improvement and Targeted Support & Improvement
  - Research and evaluate effective practices



