



Comments on Working Group 4 draft

September 14, 2018

Dr. William E. Kirwan, Chairman
Maryland Commission on Innovation and Excellence in Education
Sent by electronic mail
PreK-12InnovationandExcellenceCommission@mlis.state.md.us

Dear Dr. Kirwan and Members of the Commission:

We appreciate the opportunity to comment on Working Group 4's recommendations. Our recommendations and comments on different sections follow.

As a preface, we advocate that more be done in this group and in the commission as a whole to address the impact of race on student achievement, separate from poverty. Raj Chetty¹ and others' work point to the significant impact that race plays in student and life outcomes. We asked at the first "At-risk Students" Working Group 4 meeting that MSDE present disaggregated race and poverty data so as to enable the group to grapple with policy recommendations to address the racial achievement gap. The Maryland Longitudinal Data System Center's presentation to the full Commission perhaps was intended to address this but if so did not lead to new proposals.

We are heartened that the commission will get feedback from expert, Dr. Ivory Toldson. But we remain concerned that the now-imminent deadlines for the commission's work will not allow the kind of discussion that will result in proposals for policies, staffing, and programs to reduce racial disparities. Funding and programs for students from low-income families is essential. But since we know that at all income levels there is a racial gap in achievement and access to programs, this too must be addressed.

Concentrated Poverty Weight

We are encouraged by the inclusion of a Concentrated Poverty factor in Working Group 4's recommendations (currently envisioned as a per school categorical amount plus a per pupil amount/weight). When ACLU-MD served on the MSDE Stakeholder Advisory Group in 2015, we presented research about the impact of concentrated school and neighborhood poverty on student achievement, attendance, and emotional and physical well-being.

- It is essential that the Concentrated Poverty factor be robust enough to provide intensive supports and services to the relatively narrow group of schools that serve communities of concentrated poverty. The amounts suggested are not close to sufficient--the \$236,784 per school proposed for a Community Schools Coordinator and health practitioner and

¹ <http://www.equality-of-opportunity.org>

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the \$2,394 per pupil² for additional extended day and two transportation aide-level staff. We support these; they are just not enough.

Missing are sufficient staffing ratios for school counselors, social workers, psychologists, restorative practice coaches, staff to address chronic absenteeism and re-engagement, and health and dental health services, as well as transportation for extended day programs. Family support is also essential—family engagement staff, parenting support, community mental health services, and housing specialists. (As just one example, families in neighborhoods of concentrated poverty frequently are thrown into crisis due to the threat of losing housing which leads to moves out of neighborhoods, high mobility for children to different schools within a school year and consequent lower attendance and achievement).

The Baltimore Promise Heights model was presented as one example of the intensity of wrap-around services. Their mentor program for middle and high school males has a 1:20 staff ratio to allow for intensive one-on-one and group work which includes coaching, classroom support, substance abuse issues, employment concerns, and family issues (many are parents).

Additional academic staff are also needed such as coaches for teachers (often first-year teachers). We strongly urge the Group to add eight weeks of summer programming (academic and enrichment) for all children in schools of concentrated poverty; summer learning loss is well-documented and can be remediated.

- The Concentrated Poverty factor/weight should be provided to schools with high levels of poverty. The Working Group did not clearly define concentrated poverty, with perhaps some level of confusion about the difference between census tracts of 40% poverty (very high poverty affecting relatively few neighborhoods across the country) and schools with 40% children eligible for Free and Reduced Meals (40% of the children being at 185% of the federal poverty level). Those are quite different schools and neighborhoods³.

We ask that consultants and the Group analyze the possibility of beginning Concentrated Poverty funding at 50% Free Meals (Free Meals eligibility is 130% of the federal poverty level) with full funding at 75% Free Meals level. There is not a hard line for concentrated poverty's impact but if we want to focus intense services on the children and families in most need and furthest behind in achievement, this approach is more targeted (see Compensatory Education comments below). The Group was not presented with scenarios like this and we ask that they be considered—a much higher Concentrated Poverty factor/weight to a more narrow set of schools.

- We agree that the weight should be along an escalating scale so there are no “cliffs”. As the Group envisioned, starting at 50% of the services and staffing at the lower end and escalating to 100% funding for the services and staffing at a certain point makes sense.

² It was unclear from the discussion whether this per pupil was derived from applying it to all students in the school or just those eligible for FARMs. Research indicates that concentrated poverty affects all students in a school.

³ Powerpoint by Dr. Robert Balfanz, et al, *Unpacking Poverty and its Impact on Student Success: Concentrated Neighborhood Poverty*, March 10, 2015, Johns Hopkins University Colloquium II, provided by Bebe Verdery to Dr. Kirwan and staff.

- We fully support the proposal for a funded Community Schools Coordinator position. We caution, however, that an assumption is being made that one coordinator can bring all the services and staffing into a school that are necessary without further expense. Current Community Schools in operation may be able to access certain partnerships that are paid for by non-profits or governmental entities. But someone is raising the money for those positions. It is not a replicable model to assume that a mental health non-profit that partners with a few Community Schools now has the capacity to provide mental health services for many more Community Schools. Staffing for the services listed above must be built into the model. Insufficiently funding this model will further inequity.

Compensatory Education Weight

While this weight has not been before Group 4 directly, discussion of the Concentrated Poverty weight is intertwined with the decisions that will be made about the Foundation amount in the formula and the Compensatory Education (“Comp Ed”) weight for children eligible for Free and Reduced Price Meals. APA has recommended raising the Foundation amount and drastically lowering the Comp Ed weight.

- We believe the Comp Ed weight should not be reduced, to ensure that low-income students at all schools receive the staffing and services they need.
- It was suggested earlier in Group 4 that the Concentrated Poverty weight start in schools with poverty as low as 40% FARMs. In our view, those childrens’ needs should be met by sufficiently funding the Comp Ed weight.
- Raising the Foundation per pupil while lowering the Comp Ed weight disequalizes the formula and tilts it more toward students from families with higher incomes who are already achieving at higher levels. We understand the Commission’s drive to increase achievement to international standards and that most higher achieving students do not reach that bar. But we should also be concerned about the equity of the formula.

Proxy for Poverty

Per how school poverty will be measured, ACLU-MD reiterates our position that Direct Certification with a 1.8 multiplier should be used. The multiplier should help approximate the current FARMs (Free and Reduced) poverty measurement and at least partially account for the students from low-income undocumented families who are not eligible for the programs that Direct Certification captures. When MSDE implements statewide direct certification, the variability among school system capture rates should become more uniform. It would be ideal if additional federal programs such as Medicaid were included; then, the multiplier might need to be adjusted.

We strongly oppose a requirement that schools and districts that use the Community Eligibility Provision (CEP) collect alternative forms. (Schools participating in CEP are not allowed to collect the FARMs forms used to count students from low-income families.) Because the alternative form is not tied to the provision of meals, it is much more difficult to get families to submit them and the count for Compensatory Education aid then becomes inaccurate, depriving districts of needed funding and showing less poverty than actually exists.

Tutoring

We reiterate our support for the positions in earlier letters from the Education Advocacy Coalition and the Maryland Education Coalition. In general, the recommendations fall far short of what the research shows (limiting tutoring to K-3, the 1:125 staffing ratio, etc.).

Thank you again for the opportunity to give input.

Sincerely,

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Cc: Rachel Hise