

BALTIMORE CITY PUBLIC SCHOOLS

Catherine E. Pugh
Mayor, City of Baltimore

Cheryl A. Casciani
*Chair, Baltimore City Board of
School Commissioners*

Dr. Sonja Brookins Santelises
Chief Executive Officer

August 30, 2018

Dr. William "Brit" Kirwan, Chair
Maryland Commission on Innovation and Excellence in Education
c/o Office of Policy Analysis
Department of Legislative Services
90 State Circle
Annapolis, MD 21401

Dear Chair Kirwan,

On behalf of the Baltimore City Public School System (City Schools), I am writing to share several concerns related to the work group recommendations presented during last week's meeting of the Commission on Innovation and Excellence in Education (Kirwan Commission).

Please note that the following is preliminary and represents only City Schools' most overarching concerns. The forthcoming letter from the Maryland Association of Boards of Education (MABE) outlines several additional concerns also shared by the district. We respectfully request that both letters be carefully reviewed for consideration by the Commission and may identify additional concerns as there is more time to review the recommendations of the working groups.

Early Childhood Education – Working Group 1

- Access to early childhood education has long been a priority of City Schools. Despite the fact that pre-k received no specific per pupil funding from the state, City Schools began an aggressive pre-k expansion in 2007-08, increasing seats by 50% and phasing in full-day programs districtwide. The investment has paid off as children who attend City Schools' pre-k programs consistently demonstrate readiness for kindergarten at rates that meet or exceed their peers' scores statewide. In addition, the kindergarten readiness rates of City Schools' students are higher than those of students coming from other pre-k settings. Given the district's demonstrated success in this area, City Schools is strongly opposed to the requirement that 50% of pre-k seats be reserved for private and/or community-based pre-k providers by the fifth year of the legislation's implementation.
- While we appreciate the attention that has been given to the issue of access to early childhood education, we are concerned by the lack of discussion regarding funding mechanisms. Specifically, City Schools has noted previously that funding for early childhood ought to be captured in the student base and allow for inclusion of all appropriate weights such as special education, poverty or status as English language learners. An additional add-on to account for the cost of smaller class sizes and para-educators is equally important but has not been discussed.
- Student transportation represents another issue that the Commission has not yet addressed. As an urban district, City Schools face significant costs and challenges associated with specialized transportation, particularly as these relate to homeless and special needs student

populations. As documented previously, this is a tremendous cost-driver that needs to be taken into consideration as a new funding formula is developed. It is in this light that we are particularly concerned by the recommendation to address transportation for pre-k students only, as well as the suggestion that such a significant program expense would be grant-driven under the auspices of MSDE. Transportation for all students needs to be fully captured in the funding formula.

- The failure of the Commission to address capital needs continues to be of serious concern to City Schools. City Schools' capital challenges were fully documented in the 2012 Jacobs Report – a comprehensive facility condition assessment – which concluded that it would cost \$2.5 billion to bring all City Schools buildings up to minimally accepted standards. In 2018 we estimate the overall repair costs at \$3 billion, based on increased construction costs over the last six years. Although Baltimore City is home to the oldest portfolio of school buildings in the state, the local funding we receive for capital pales in comparison to our more affluent neighbors, and the percentage of the total state CIP funds City Schools receives is not consistent with the need of the school district as compared to other school districts in the state. For example, when considering just the past three years, comparing City Schools to Baltimore County (FY16-18), local CIP dollars City Schools received totaled \$51M while Baltimore County received \$467M. With such limited funds, City Schools never gets through its list of needed repairs. Existing CIP challenges are only exacerbated by the expansion of pre-k. However, instead of addressing the well documented capital needs by expanding capital funding to address both existing capital challenges and the proposed expansion of pre-k, the recommendation instead repurposes capital funds that are already insufficient to meet current facility needs for the construction of pre-k classrooms. City School strongly opposes this approach.

High Quality and Diverse Teachers and Schools Leaders – Working Group 2

- Like urban school districts across the country and in Maryland, City Schools struggles regularly to fill 100 percent of its teacher vacancies. Programs such as Teach for America and other alternate certification pathways are critical to our ability to fill shortages and significantly minimize the number of teacher vacancies we have at the beginning of the school year. Alternative certification programs annually account for a majority of new teacher hires in a few high-need content areas. Consequently, we are extremely concerned by the recommendation to significantly increase requirements for alternative certification, potentially ending some current programs despite data showing that teachers certified through their programs are at least as effective as other new teachers.
- The recommendation to adopt a highly rigorous but untested exam such as edTPA or PPAT is concerning to City Schools. While the working group feels the current Praxis is not sufficiently rigorous, we remain concerned about the disproportionate screening effect that Praxis exams are having on candidates of color. Some national Praxis Core data show that Black and White test-takers have alarmingly different passage rates. Baltimore City Teaching Residency, a City Schools partner, has previously discussed with us a concept for some pathway where teachers who participate in a MAAPP, complete all program requirements, and meet their employing district's effectiveness expectations could still obtain a RTC and eventually an SPC even if they could not pass Praxis. While we would not want the state to lower the bar across the board for teachers, given the scale of their impact on students, we also would not want to prevent students from accessing effective teachers who are really only held back by a test. We would like to see a two-pronged approach with (1) more flexible standards and more local educational agency autonomy for issuing initial/conditional licenses followed by (2) raised standards for professional licensure

that include evidence of effective practice and impact on student learning. We are extremely concerned about any approach that seeks to raise the bar by requiring inputs (e.g., different exams) with little or no evidence that those inputs lead to higher levels of teacher performance or student learning.

- The working group did not present recommendations for what new requirements may be necessary in order for teachers to renew their certifications. Given the present challenges with this process, City Schools asks that the working group provide clarity in this area.
- While City Schools appreciates and supports the intent of teachers being in the classroom for only 60% of the school day, we are concerned that no specifics have been shared regarding the necessary and significant funding increases that would need to accompany such a recommendation to support the provision of additional classroom or resource teachers as well as the additional costs for meaningful professional learning opportunities. Similarly, given the existing administrative demands on the position, we are equally concerned by the lack of a funding recommendation in order to accommodate the requirement that assistant principals be in the classroom for 40% of their day and principals for 10% of their day.
- In general, the very detailed plan for career ladders may excessively limit local educational agencies ability to develop and/or maintain their own thoughtful career ladders.

College and Career Readiness Pathways – Working Group 3

- While the working group cited its intent for 65% of students to be able to meet the newly developed CCR standard by the conclusion of 10th grade, it is unclear what supports will be given to students who are unable to meet this new threshold, particularly since the working group indicates students may stay until the age of 21 to meet the standard. Although the recommendations mention that programs will need to be developed for students who have not achieved the CCR standard by this time, City Schools remains concerned by the lack of detail in this important area.
- While the details regarding supports for struggling students are ambiguous, the recommendations clearly indicate that schools identified as low-performing based on their scores on statewide assessments will be visited by inspection teams working under the supervision of MSDE. Based on their findings, those teams will make recommendations for addressing problems – including possibly requiring a school to use State courses as designed until such time as its students are on track to meet the CCR standards by the end of 10th grade. City School is opposed to this recommendation as these types of curriculum mandates have proven unsuccessful in the past. This method of oversight has only served to create further bureaucracy, and has disproportionately impacted districts serving high percentages of students of color as well students living in poverty. Additionally, as City Schools continues its work with national partners to build a coherent high-quality, standards-aligned instruction from K-12, we have built buy-in through careful on-boarding and professional development. State-mandated curriculum would disrupt the foundation we have built and would create misalignment in our work.

Categorical Funding / Funding that Follows the Student

Based on recommendations presented across all three working groups, it appears the Commission is heading toward categorically based funding that follows the student. City School opposes such a requirement as this could limit the flexibility needed for reasonable, legally-required circumstances and could prohibit LEAs from being able to utilize available resources effectively to meet the needs of their students. Please note the additional details below:

- The funding that City Schools currently receives is not enough to cover all costs related to all students. As a result, City Schools must use general education or compensatory education funds to cover the cost of certain services and payments – many of which are required by law – but for which we do not receive the necessary funding. For example, while approximately \$300 million is estimated annually to provide special education services to our students, City Schools only receives approximately \$80 million for this expense under the current state and federal formula. Consequently, it is necessary to use about \$220 million in general and compensatory education funds to cover the cost of serving our students with special needs. While we’re aware that the Commission intends to include a placeholder amount of increased funding for special education until the special education report is released in December 2019, it is highly unlikely that a funding formula could be developed at the state level that correctly funds every category of funding (i.e. special education, English language learners, compensatory education, etc.) for the many, extremely diverse LEA’s in Maryland. If the formula is not correct for every category, for every LEA in the State, LEA’s will be prohibited from moving funds the way that’s required to meet legal obligations as well as to best serve the needs of students in their jurisdiction.

- As a high-poverty district with a considerable population of homeless students, City Schools has the highest mobility rate in the state and must regularly address the transient nature of our students and their families. Any model that requires funds to follow students to the school level would mean a system of ongoing/continuous adjustments due to enrollment fluctuations at individual schools, leading to significant disruption of classroom programming.

- As noted above, City Schools is home to the oldest portfolio of public school buildings in the state. Given the critical needs of our aging infrastructure, we have several debt service expenses that must be paid for from City Schools’ operating budget. For example, as required per the 21st Century Buildings legislation, City Schools must pay \$30M annually – a portion via from the Guaranteed Tax Base grant intercept – from general operating funds for payment related to program debt service. Additionally, City Schools was granted the authority to issue bonds, and has subsequently issued revenue bonds and executed master leases, for which the outstanding debt obligation liability must be repaid. City Schools will spend \$21.6M in operating dollars for FY19 budgeted debt service expenses.

- City Schools’ carefully crafted Fair Student Funding (FSF) model allows funds to be provided to schools based upon student characteristics and need. Under the FSF model, funds are distributed to individual schools similar to the way in which the State of Maryland disburses education funding to individual school districts.
 - City Schools has developed two different per pupil funding formulas over time:
 - Charter school revenue-based funding in accordance with state guidance
 - Traditional school FSF, which is currently in transition as we’ve recently updated the formula to include, for example, revised weights to address concentrations of poverty.
 - The transition to the new FSF model will provide revenue-based allocations after districtwide exclusions, some of which relate only to traditional schools.
 - City Schools’ FSF model includes several services that are provided to students but charged centrally such as transportation, school police, and pre-k.

- Baltimore City includes twice as many charter schools as the rest of the LEAs in Maryland combined. We currently oversee 34 of Maryland’s 50 charter schools. Charter schools have flourished in Baltimore City, and they have done so under the existing Maryland charter law.

- As noted above, City Schools has developed a charter school revenue-based funding model in accordance with state guidance.
- City Schools has proposed changes to this model for FY19 after engaging last school year with an outside entity – a national expert in public education funding – that reviewed our Fair Student Funding formula and provided a comparison of charter school and traditional school funding. That review found that a portion of the costs of services provided to charters are being borne by City Schools' traditional schools. The ability to fully address this problem is compromised by the historic implementation of the current formula, the state guidance on charter funding including the guidance that limits LEAs to take 2% for administrative expenses, and pending litigation.
- If the Kirwan Commission proceeds with a requirement for funds to follow the student to the school level, implications to charter school funding will have to be considered in accordance with Maryland's existing charter law.

On behalf of City Schools, thank you for your commitment to achieving adequacy and equity for public school students throughout Maryland. Please do not hesitate to reach out if we can provide additional information as the Commission prepares to finalize its recommendations in the months ahead.

Sincerely,

A handwritten signature in blue ink that reads "Sonja B. Santelises". The signature is written in a cursive, flowing style.

Sonja Brookins Santelises, Ed.D.
Chief Executive Officer

cc: Kirwan Commission Members
Rachel Hise
Baltimore City Board of School Commissioners