



To: Ms. Joy Schaefer, Chair, and Members of Workgroup 4

From: Attendance Works

Date: September 14, 2018

Workgroup 4: More Resources for At-risk Students

Comments on Design Assumptions and Implementation Considerations

Thank you for the opportunity to provide comments and suggestions on the Workgroup's design assumptions and implementation considerations draft. We appreciate the time and effort involved in producing its recommendations.

As an advocacy and technical assistance organization focused on ensuring that students are in school every day, Attendance Works applauds the inclusion of a weight for concentrated poverty and the provision for additional resources for the community schools and mental and behavioral health services. However, as we describe in more detail below, we urge the Workgroup to provide additional resources for another group of at-risk students, namely children of color. We believe that these additional supports are absolutely essential to the Commission's goal of achieving a world-class educational system.

In addition to the comments and suggestions below, we are also submitting as a separate document, a red-lined version of Workgroup 4's Draft Design and Implementation Considerations.

Policy Area Statement:

- **Include a short preamble that clarifies which student groups are considered "at risk" by the Commission and which of these fall under the charge of Workgroup 4.**

Element Detail 4a: Add a concentrated poverty weight



- **Add a brief statement of the case for the concentrated poverty weight.** While APA staff felt that evidence for such a weight was inconclusive, the Commission’s own investigation, the experience of other high performing systems, and national and local evidence documents the impact of concentrated poverty on students. Because this weight is not currently a part of Maryland’s funding formula, we believe it important to describe the Commission’s reasoning and evidence for the concentrated poverty funding. (*Design Assumption 1.*)
- **Set the eligibility level for concentrated poverty funding at no higher than 40%.** All schools at this level and above would receive the full amount of the categorical, fixed amount funding. Schools with 75% and higher poverty levels should also receive the full per-pupil allocation. Recognizing that the effects of concentrated poverty are strongly negative at lower levels of poverty and to avoid “cliff effects,” schools in the 40% to 74% range should receive the share of the per-pupil funding amount that is proportionate to their poverty rates. (*Design Assumption 3.*)
- **Clarify the role of Local Management Boards (LMBs) at the local and state levels.** As this section currently reads, the role of LMBs is only a state-level role, despite the fact that LMBs work at the local level. (*Implementation Consideration 3.*)
- **Explicitly connect accountability processes and measures required by the Commission with those required by Maryland’s ESSA accountability rubric.** In the case of the funding for schools with concentrated poverty, the Commission should build on the fact that school level attendance (chronic absence) rates and school climate assessments will comprise 25% of each school’s report card rating beginning this academic year. These are two psychometrically strong measures that will be defined and reported uniformly by each school and LEA, and assessed and reported publically each year by MSDE. Whenever possible, the Commission should coordinate its requirements for accountability, reporting calendar, and indicators with those that schools are already tasked with collecting and that Maryland must report to the federal government. Make recommendations that disaggregation of those data be augmented by additional reporting of outcomes by student race x poverty, and race x special education status, in order to show disparities in greater detail. (*Implementation Consideration 5.*)
- **Set realistic timeframes for program implementation and assessment.** Establishing health centers and community schools are not overnight tasks. Measurable progress on outcomes is likely to take a number of years. The Commission’s accountability schemes should take this into account when determining reporting and “consequences” for schools. (Element Detail 4a; *Implementation Consideration 6.*)

Element Detail 4d: Revise the funding formula’s weight for English Learner (EL) students

- **Develop recommendations to ensure that schools with high concentrations of EL students qualify for concentrated poverty status, even if their Free and Reduced Price Meal (FRPM)**



- **rates (or their proxies) are too low.** While the Workgroup has made the case that compensatory funding is likely to cover resources required by individual EL students, it has not considered the additional resource needs of schools with very large numbers of EL students. Indeed, schools with high concentrations of EL students will require supports similar to those needed by schools with large numbers of poor children, given that their students are often from many different countries, speak a variety of languages and may have little or no formal education experiences. Many, too, suffer from violence and trauma.

While it is likely that many EL concentrated schools would be eligible for additional funding under the Concentrated Poverty weight, it is not assured. Given that the undercounting of immigrant children for compensatory education is considerable, it is not a stretch to see how a school's documented poverty level could fail to qualify them. Using the number of EL students as a proxy measure for concentration of need would obviate that problem, and likely provide a more accurate measure of disadvantage in schools with high EL populations. *(Design Assumption 2.)*

Safeguard the Future Adoption of Higher and Tiered Funding for Special Education Students

We understand the Commission's desire to use a temporary funding weight for special education, so as to allow the on-going work of the Special Education Committee to be completed. However, given the abysmal outcomes for special education students, and the rare opportunity that you have, we do not believe that the Workgroup or Commission should abdicate its responsibility for recommending the additional, graduated funding that special education students will need to be successful. The Workgroup's document should make clear that the 2.18 rate is not close to adequate and must be revised within a three-year period. It should consider recommending additional increases in the weight after three years, should the work of the Special Education Committee be delayed or its recommendations not adopted.

Address Racial/Ethnic Disparities

Last, but not least, we urge you and the members of Workgroup 4 to take into account the recommendations of numerous organizations and experts that the Workgroup and Commission directly and substantively address the needs of African-American, Hispanic, Latino, and Native American students. We understand that current research shows that the strongest contributor to the academic outcomes for these students is poverty and acknowledge that the additional resources for poor children will be helpful. However, we also know that race plays a very significant role that is distinct from that of poverty. Indeed, some of the schools and LEA's with



large disparities are not schools with concentrated poverty. Further, the relative strength of poverty as compared to race differs by outcome. For some outcomes it may act as a contributing factor, for others such as suspensions and arrests, race has a more primary role. In short, racial bias – current and past - systematically and substantially disadvantages Maryland’s children of color in schooling and in virtually every aspect of their lives. Given the importance of eliminating disparities, the failure to address racial/ethnic disparities in the recommendations for “at-risk” students is an inexplicable and egregious omission. Although race-based funding policies have been judged as unconstitutional, the same is not true for funding for programs and interventions that address large disparities in the performance of subgroups identified by the state in their ESSA implementation plans. Indeed, ESSA’s Targeted Supports and Interventions provisions require LEAs to intervene when identified subgroups in schools underperform relative in statewide comparisons.

Thus, we make the following recommendations:

1. We urge the Work Group to explicitly acknowledge, in this document, the powerful, inequitable effect of race and ethnicity on students’ educational outcomes in Maryland.
2. We recommend that it, and the full Commission, include specific requirements for MSDE to regularly and, publicly release data that disaggregates student outcomes by both poverty and race for every Maryland school, so that the separate impact of race and ethnicity are clear.
3. Similar to the funding mechanism we proposed for schools with large numbers of EL students that did not meet the concentrated poverty threshold, we recommend that schools with high performance disparities for subgroups, regardless of concentrated poverty status, be eligible for
 - a. resources to undertake a needs assessment to determine the extent of and steps necessary to address these disparities, and
 - b. funds to support intensive training in racial bias, cultural competence and interventions for all adults in these schools.
 - c. funds to support the implementation of alternatives to suspensions, expulsions, citations, and arrests, including, but not limited to, programs such as restorative practices, SEL curricula and PBIS.

Thank you for the opportunity to provide feedback. Please feel free to contact either: Sue Fothergill, Director of Policy, Attendance Works or Jane Sundius, Senior Policy Fellow, Attendance Works should you have questions or comments.

Sue Fothergill, Director of Policy



Attendance Works

Advancing Student Success By Reducing Chronic Absence

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