



December 15, 2018

**To: Members of the Kirwan Commission**  
**From: Attendance Works**

**Comments on the Work Plans and Recommendations of the Commission on  
Innovation and Excellence**

Attendance Works is a national advocacy and technical assistance organization that is focused on ensuring that all students have the resources and supports they need to attend school every day, and to be ready and able to learn. Over the past five years, it has worked with stakeholders across Maryland and with policymakers at the Maryland State Department of Education (MSDE,) Charles, Kent, Baltimore, and Montgomery County and Baltimore City Public School Systems, focusing on issues of educational access and equity.

**Recommendation 1: Require the MSDE-produced school and district performance reports to provide cross-tabulated subgroup and grade level data. Ensure that the State’s oversight body and MSDE assess these data, using them to identify and remediate performance gaps.**

Publicly available, disaggregated data are essential if educators and policymakers are to allocate resources effectively. Data can help the public and oversight bodies to understand the progress of the reform and increase confidence that resources are being put to their best use.

As a part of the federal Every Student Succeeds Act (ESSA) implementation, MSDE has substantially revised its annual school and district performance reports. While the reports include a good deal more information than has been true in the past, they do not have sufficient detail on subgroup and grade level outcomes. To improve the reporting, the Commission should recommend that MSDE school performance reports provide:

- **Cross-tabulated data for all currently reported student demographic and service subgroups.** For example, such data would allow stakeholders to compare the performance of students of color who are English language learners with white students who are also English language learners. It would be possible to look at outcomes for poor and non-poor special education students, and poor and non-poor students of color. These kinds of comparisons are critical to pinpointing and addressing performance gaps.
- **Grade level data, particularly for the K-1, 5-6 and 8-9 transition years.** It is in these transition years that many children, especially those who are likely to struggle

in school, begin to fall off the track to college and career readiness. Being able to see progress and slippage in these years can help effectively allocate resources and address student needs.

**Recommendation 2: Explicitly identify student attendance as a key measure of accountability and ensure that LEAs and schools have the support and funding they need to address high levels of chronic absence.**

Attendance may seem to be an issue that is beyond the ability of schools to affect. However, research has shown that its effects on student outcomes from pre-K to post secondary schooling are too consequential for schools and districts to ignore. Students miss schools for many reasons, but far too often their absences are caused by lack of resources, poor school climate, fears of safety – all barriers to schooling that students in high need communities and schools face. Researchers who have recently assessed trends in student outcomes in Massachusetts have identified student attendance as a key measure, one that has significant and substantial impact on student outcomes, even after controlling for previous performance and other demographic factors. This was particularly true for students attending high poverty schools. In short, attendance can shed light on educational equity and access in schools and districts across Maryland, key concerns of the Kirwan Commission.

Importantly, attendance is psychometrically strong, highly predictive of student outcomes, universally understood and available for each and every student from the first day of school forward. Research has also shown that school policies and practices can and do affect student attendance and that focusing on attendance can make the case for community support of services to schools and students stronger.

In addition, it is one of very few non-test based indicators that meet the requirements for accountability indicators under ESSA. As a result, it has been chosen by Maryland, 36 other states, and the District of Columbia as measure in their ESSA-mandated accountability rubrics

For all of these reasons, the Commission’s recommended funding formula should ensure that schools with high levels of chronic absence receive funding to identify and remediate barriers to attendance, hostile or non-engaging school climates, and other conditions that hinder regular attendance. Further, the Commission’s designated governance entity should use attendance to assess the progress of schools and to hold them accountable if they fail to address high levels of chronic absence.

**Recommendation 3: Learn from Massachusetts, not just from its impressive successes, but also from its failures.**

Massachusetts has been rightly held up by many Commissioners as an exemplar and model for Maryland to follow in developing its education reform recommendations.

Since the inception of its reform effort 25 years ago, the State has greatly improved the academic performance of its students and even reduced the gaps for students of every demographic and service group. Due to its success, the Commission has incorporated many of the strategies in the Massachusetts plan into its recommendations for Maryland.

However, while achievement gaps have been reduced, they are far from having been eliminated; children of color, poor children, and those with disabilities and English language learning needs continue to perform well below their peers remain whether one examines test scores, attendance, suspensions, high school graduation, college readiness, or college enrollment.

The reality of continued unequal performance in Massachusetts has implications for the Commission's strategies and recommendations related to high need students. Attendance Works recommends that it:

**- Assess levels of funding and support for Maryland's high-need students to ensure that they are stronger and more comprehensive than those implemented by Massachusetts.** The Commission must make it clear that Massachusetts' outcomes, while encouraging, are not sufficient for Maryland.

For students in high need schools, these should include, at a minimum:

- a. Reduced class sizes and tutoring ratios that are not scheduled to increase after teachers are trained;
- b. Funding for as-needed tutoring and other learning supports for students from Kindergarten through Grade 12 that will continue until student performance gaps are eliminated;
- c. Funding for eight week, six hour per day summer programming and three hour, five day a week after school programming for all students.

**Recommendation 4: Revise the Commission's Career and College Readiness Expectations and Supports to create a system that will work for all Maryland's students.**

The Commission is recommending a College and Career Ready standard that it expects will **not** be met by a 20 to 25% of Maryland's students at the end of its 10-year implementation period. The plan is not to increase levels of resources and supports to ensure all will meet the standard, but to accept that roughly 10,000 to 15,000 thousand will not be ready for college or a career when they graduate. In addition, the Commission is recommending that students be designated as CCR based entirely on standardized test scores in English Language Arts and Algebra I. This recommendation ignores research showing that other measures, such as attendance and grades, are equally, if not stronger, predictors of postsecondary success. It also disregards the strong push by educators, parents, and other stakeholders in Maryland to reduce reliance on standardized tests in the ESSA

accountability rubric and to add measures that will result in more comprehensive assessments of student attainment, growth and school performance.

The system the Commission’s workgroup has proposed is, in essence, a return to tracking. It sets up a two-tiered school system beginning in middle school, where teachers determine which students are unlikely to meet the 10<sup>th</sup> grade standard and place them in an “extended learning” program. It continues in high school, where performance on two standardized test scores determines which students will be able to move into the “ambitious and rewarding post-CCR pathway programs.”

The hard truth is that its adoption would result in a system in which disproportionate numbers of students who are poor, of color, English language learners, and/or require special education services would be barred from enriched college and CTE opportunities – the very opportunities that the Commission wants to expand. It is likely that super majorities of students in some schools will not attain this CCR standard, thereby removing the need or funding for their schools to provide any of these enriched courses and opportunities.

It is difficult to see how this expectation squares with the Commission’s stated goal of excellence, innovation and equity for all of students. As remedies, Attendance Works recommends that the Commission:

- **Increase recommended funding and supports so that virtually all students can reasonably be expected to reach CCR standards;**
- **Ensure that enriched opportunities are available throughout high school for all students for the purpose of engaging and preparing them for careers and college, rather than making them dependent upon academic performance.**
- **Expand early warning indicators to include a broader range of “on-track to success” measures, such as attendance, behavior, physical health, vision and hearing.**
- **Revise the 10<sup>th</sup> grade CCR readiness assessment so that it, too, is based on a broad set of student indicators that more fully measures what it means to be “career and college ready” and allows for more flexible and individualized high school paths for students.**

Submitted by:

M. Jane Sundius, PhD.  
Senior Policy Fellow  
Attendance Works

Sue Fothergill  
Assistant Director, Policy  
Attendance Works