

# 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*

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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,

As the Kirwan Commission nears completion of its work, we appreciate the opportunity to respond to both the recommendations presented by Working Group 2 – High Quality and Diverse Teachers and Leaders, and the subsequent feedback recently provided by Dr. Ivory Toldson.

On behalf of the Baltimore City Public School System (City Schools), please see below for a summary of our most overarching concerns as they relate to ensuring a diverse and effective teacher workforce. Please note that additional concerns may be identified once the Commission issues its final report and legislation is eventually introduced before the Maryland General Assembly.

- **Current licensure rules set a misleading bar, not a high one, often screening out talented teachers.** Maryland currently requires prospective teachers to pass several standardized tests to earn a teaching certification. This is a well-intentioned effort to ensure that only the most promising teachers make it into the classroom – but there’s no evidence that such a rigid, test-based approach to licensure actually accomplishes this goal. All Maryland teachers, for example, must pass the Praxis exam even though no research has proven it can accurately predict how well they can teach. City Schools remains 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.
- **Maryland’s top-down, test-based approach to licensure shuts promising teachers out of the profession and makes our teacher workforce less diverse.** As noted in our August 30 letter to the Commission, Praxis exams have been shown to have a disproportionate screening effect on candidates of color. For example, data prepared in May 2018 by Educational Testing Service (ETS) showed that Praxis Core pass rates were 23-37% lower among black test takers and 12-17% lower among Latinx test takers compared to white test takers in reading and math (PRAXIS Core Performance Data demographic breakdown. ETS The Praxis Series. 2014-2017).

These differing passage rates are alarming and come at a time when Baltimore City Schools and many other school systems are making recruiting more teachers of color a top priority. Research shows that all students benefit from having teachers of color. More specifically, students of color who have a teacher of the same race are less likely to be suspended, more likely to be referred to gifted programs, and more likely to go to college. Additionally, a recent study by The New Teacher Project (TNTP) found that teachers of color tend to have higher expectations for students of color compared to white teachers.

- **While City Schools shares the Commission’s concerns regarding the Praxis, the current recommendations will add even more unproven standardized tests to the mix – only exacerbating the challenges outlined above.** Under the Kirwan Commission’s proposed recommendations, the state would adopt yet another licensure test – such as edTPA or PPAT – neither of which have been proven to predict classroom effectiveness, nor have been checked for potential bias against teachers of color. This would be in addition to other standardized tests in specific content or instructional areas that raise similar concerns.
- **This type of policy would contradict the advice of the expert hired by the Commission to examine and evaluate the work group recommendations from a race equity lens.** In his examination, Dr. Ivory Toldson urged the Commission to consider factors beyond test scores in licensure decisions, noting: “The working group should construct a profile that captures all of the characteristics of an effective teacher that can teach a diverse student body, that extends beyond academic preparation, and develop policies and procedures to encourage more teachers that fit this profile.”

City Schools agrees wholeheartedly with Dr. Tolson’s urging for a more comprehensive approach to licensure. To be clear, we are not suggesting that standardized tests are not a part of the picture. We are instead requesting an interrogation of the entire process coupled with what we know about effective teaching and learning.

- **City Schools encourages the Commission to create a higher, more meaningful bar for licensure by supplementing tests with real evidence of what matters most – teachers’ actual performance in the classroom.** Relying so heavily on standardized licensure exams that have not been linked to teacher performance or student outcomes paints a picture of a teacher’s potential that is incomplete at best, and misleading at worst. Rather than push certification requirements even further in this direction, the Commission should create a higher, more meaningful bar based on *evidence of teachers’ performance in the classroom*, which research shows is by far the best predictor of their future success.

As a starting point, local educational agencies should have more flexibility to grant initial and conditional licenses to teachers coupled with raised standards for professional licensure that include evidence of effective practice and impact on student learning. Teachers, for example, who can show objective evidence of leading their students to significant academic growth – regardless of whether they have passed the state’s required licensure exams – would have a pathway to remain in the classroom.

Far from lowering the bar for licensure, this approach would provide a model for a high bar that would more consistently screen in teachers who have proven they can help students succeed. It would replace guesswork about teachers’ classroom effectiveness

with direct observations and evidence. Furthermore, based on the data and anecdotal evidence about biases in current licensure exams, this approach would bolster efforts to diversify the teacher workforce across the state.

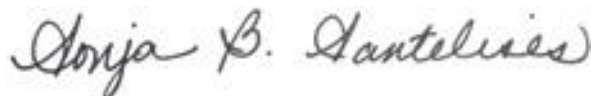
- **In schools across Maryland and throughout the nation, the racial disparity between students and the teacher workforce is large and growing.** While half of K-12 students in the U.S. are people of color, more than 80 percent of teachers are white. The National Education Association found that in 2011, only 16.6% of Maryland teachers were African American, while 57.5% of Maryland students are youth of color. A recent study by the Education Trust found that half of white students in New York and 10 percent of students of color attend schools without a single black or Latinx teacher.

We at City Schools have seen plenty of evidence that the current test-based approach to licensure shuts talented teachers out of our classrooms. It costs dozens of promising teachers every year a chance to make a difference for our students. These are dedicated professionals who have proven their ability during summer training, have effective or higher evaluation ratings and have developed strong content knowledge – but who are barred from the classroom solely because they have not passed an exam. They and the students who depend on them currently have no recourse under Maryland law – and we have no reason to believe this problem is limited to Baltimore.

In closing, given that research has born no connection between exam success and effectiveness in the classroom, City Schools remains troubled by the Commission’s proposal to require more rigid teaching entry requirements which will negatively impact the ability of LEAs across the state to recruit and retain a diverse, effective teacher workforce. We instead encourage the Commission to ensure more flexible standards and increase local educational agency autonomy for issuing initial/conditional licenses followed by raised standards for professional licensure that include evidence of effective practice and impact on student learning.

Please know that we recognize the magnitude of the work completed by the Commission up until now, as well as all that lies ahead in the coming weeks and month, and we greatly appreciate your consideration of our concerns. Please do not hesitate to let us know if we can provide additional information as the Commission prepares to finalize its recommendations.

Sincerely,



Sonja Brookins Santelises, Ed.D.  
Chief Executive Officer

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