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April 17, 2019

Dr. Karen B. Salmon
State Superintendent of Schools
Maryland State Department of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dr. Justin M. Hartings, President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Drs. Salmon and Hartings:

The Maryland Association of Boards of Education (MABE), representing Maryland's 24 local boards of education, appreciates the opportunity to provide input as the State Board of Education considers modifications for the 2019 accountability system. Specifically, MABE's comments address the potential single-year adjustment of Maryland's current Star Rating System. MABE has several concerns about modifying the system at this time.

At the time the Stars Rating System was proposed, development of the state's overall accountability system was incomplete. With this understanding, the State Board of Education decided to move ahead to implement the five-star system. Development of Maryland's comprehensive accountability system remains incomplete at this time. Moving forward, additional factors will be added to individual school or school system scores, including results of the school climate survey and new science and social studies assessments. There also will be changes to the ELA and math assessments during the next school year. In our view, making adjustments to the rating system based on only one year of data for an evolving system is neither advisable nor reasonable.

We agree the system should undergo regular re-evaluation. In fact, ESSA requires states to revisit their assessment systems periodically. Changing the rating system now, before the full system is in place and baseline data has been established, moves the goal posts again for students, schools, and school systems. Further, making a change now does not preclude the need to make further adjustments when the additional accountability components are added, and then again when the state re-evaluates the plan and accountability system, as required by the Act. A less disruptive approach would be to revisit the system when all the components have been put into place and after at least two years of data have been obtained.

MABE sees no apparent rational, articulable basis for adopting any one of the four alternative rating standards in lieu of the current approach. The four options that propose changes to the star rating system appear to assign schools specific star ratings to meet predetermined expectations. This contradicts and undermines the values of a criterion-based assessment program established by the State Board. The State Board thoroughly considered and adopted performance academic scores to create a criterion-based program of assessments, demonstrating a commitment to an accountability system that aligns with the standards they established. In fact, the State Board conducted a comprehensive, thoughtful, and lengthy

process to establish cut scores for state assessments. Importantly, none of the proposed alternatives either add meaningful insight into school performance or serve to inform improvement.

Although MABE strongly recommends making no changes to the star ratings at this time, if there is a decision to adopt one of the four alternatives, local school boards and school systems will need assistance from both the State Board of Education and the State Superintendent of Schools in communicating the rationale for and meaning of these changes to our communities and schools. This assistance should include a communication plan with talking points, visual collateral and online resources available for school systems, school administrators, and teachers. In particular, this is crucial for small and mid-sized school districts as they often do not have substantial communications or technology staff.

Thank you, again, for your intentional efforts to seek stakeholder input. We appreciate this practice and look forward to continuing our collaboration in the future.

Sincerely,



C. Tolbert Rowe
President

CTR:kwb

Copy to:

MABE Board of Directors
Local Board President/Chairs
Superintendents of Schools/Chief Executive Officers
Frances Hughes Glendening, MABE Executive Director
Renee Spence, PSSAM Executive Director