

BALTIMORE CITY PUBLIC SCHOOLS

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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,

Thank you for the opportunity to respond to the recommendations presented by Working Group 4 during last week's meeting of the Commission on Innovation and Excellence in Education (Kirwan Commission). On behalf of the Baltimore City Public School System (City Schools), please see below for a summary of our most overarching, preliminary concerns. Please note that additional concerns may be identified as there is more time to review the recommendations, and particularly as the costing out process evolves and specific funding mechanisms are established.

More Resources for At-Risk Students – Working Group 4

Concentrated Poverty

- City Schools strongly favors the recommendation to establish a concentrated poverty weight comprised of both a per pupil amount and fixed amount of additional funding in schools where a certain percentage of students qualify for free or reduced priced meals. However, without knowing the proposed foundation and compensatory funding formula amounts, it is impossible to determine how much additional funding would be attached to a concentrated poverty weight and whether that amount would be sufficient to adequately meet the needs of City Schools students. It is also unclear whether the per pupil concentrated poverty weight would apply to all students in a given school, or only those who qualify as being eligible for free or reduced priced meals.
- While the recommendations note increased funding for concentrated poverty will only occur in schools where a certain percentage of students qualify for free or reduced priced meals, no detail is provided with regards to what the percentage shall be, despite the fact that 40% was referenced repeatedly in prior working group discussions.

City Schools strongly opposes the 40% poverty threshold and instead recommends the floor be set at 50%, with additional support provided in schools where the rate reaches

75% and beyond.¹ City Schools believes implementation of a sliding scale is imperative in order to substantially augment resources and account for relative degrees of concentrated poverty within schools, and regrets that the working group has not addressed the sliding scale factor in its recommendations.

- Again, while the recommendations note increased funding for concentrated poverty will only occur in schools where a certain percentage of students qualify for free and reduced priced meals, no detail is provided as to how that percentage will be calculated. The working group has instead indicated this decision will be left to the full Commission.

City Schools notes that any method of determining a proxy for poverty will have tremendous implications for whether or not the final weights are sufficient. As the state's largest provider of free and reduced price meals, City Schools is strongly opposed to the APA consultants' recommendation to use an unproven and burdensome application process as the basis for obtaining income data for state funding in districts electing the Community Eligibility Provision (CEP). This type of action would put vital state funding for districts at risk at a time when the state ought to be encouraging CEP participation amongst districts and schools with concentrated poverty.

City Schools instead encourages the Commission to both expand the direct certification program to include programs allowable by the federal government and establish a multiplier to more accurately calculate a proxy for economically disadvantaged students. While the Federal government currently supports a 1.6 multiplier for CEP districts, City Schools recommends the Commission adopt Maryland's statewide average multiplier of 1.8 in CEP schools to ensure consistency across LEAs.²

In addition, policymakers should expand the types of direct certification allowed in Maryland. Under federal law, states may include as part of the direct certification count families who qualify for WIC, Medicaid and Federal Foster Care; however, Maryland currently does not allow these programs within its CEP count. While such a change will not fully solve the problem, expanding eligibility to these programs would likely assist in allowing for a more accurate capture of students who are not counted currently.

It is important for the Commission to also prioritize policy solutions for accurately counting low-income immigrant students. As has been the experience in Baltimore City, because some methods for counting low-income students do not capture students who are immigrants or whose parents are immigrants – e.g. children who are undocumented may not be eligible for programs used in direct certification, and parents who are undocumented may be hesitant to apply even if their children are eligible – the Commission should work to identify steps that do not jeopardize the privacy or safety of families to fully count low-income students in each school, regardless of their families' immigration status. Similarly, before determining which programs to include for the purposes of direct certification, City Schools cautions the Commission to conduct analysis so as to ensure that none inadvertently exacerbate the problem of undercounting

¹ Because the proposed threshold encompasses both free and reduced priced meals, it must be accompanied by a multiplier in CEP districts such as Baltimore City, given that direct certification includes only free meals.

² *Evaluation of the Use of Free and Reduced-Price Meal Eligibility as a Proxy for Identifying Economically Disadvantaged Students – Alternative Measures and Recommendations.*

<http://www.marylandpublicschools.org/Documents/adequacystudy/EvaluationFRPMEligibilityProxyEconomicDisadvantage.pdf>

that has been identified for low-income immigrant families. There must be a concerted effort to ensure these families are counted regardless of efforts to include other data sources. Finally, City Schools recommends implementation of a higher multiplier for this population to make up for the undercounting of these students, and notes that LEP students receive a higher weight than compensatory education students (.99 vs. .97) under the current state formula.

- City Schools supports the establishment of a fixed funding amount per school, but strongly opposes the requirement that such funds be used specifically to hire a community schools coordinator. While designation as a community school represents an important component of any strategy to address schools with high concentrations of poverty, the placement of a single coordinator should not be misconstrued by the Commission as a panacea for solving such challenges. The same is true for the requirement to hire a health services practitioner.

In light of the challenges that large proportions of our students face – including poverty, housing and food insecurity, trauma, and limited access to health and mental health resources, among others – the attached chart reflects the significant resources needed to comprehensively address the basic needs of our students in high-poverty schools.

While not included in the work group’s final recommendations, \$236,784 was previously suggested as the amount that would be provided for each school in which a certain percentage of students are eligible for free or reduced priced meals, with the understanding that these funds would be used to hire a community schools coordinator and health practitioner. Additionally, \$2,394 was suggested as the per pupil amount to provide services such as extended day and transportation aides, among others.

City Schools is alarmed by these amounts, as they are woefully inadequate of what is needed to ensure the success of our most vulnerable students. In sharp contrast to the two positions referenced by the working group, the following represents a sampling of the positions and services outlined in the attached chart, which we believe should be fully funded for schools with concentrations of poverty.

- Extended school day
- Extended school year
- Pre-k coaches
- Math and literacy coaches
- Assistant principals
- School counselors
- School psychologists
- Social workers
- Community school coordinators
- School-based health centers
- Student wholeness room specialist
- College and career counselors
- Enrichment opportunities, including extracurricular activities
- Before and after school care
- Housing specialists
- Family engagement programs
- Laundry equipment

- Principal support and development
- Transportation assistance to support expanded programming

City Schools has several concerns related to the proposed implementation considerations:

- Given that Baltimore City is home to more students living in poverty than any other district in Maryland, City Schools opposes the requirement for individual schools to submit implementation plans based on an assessment of need. We instead ask for the allowance of a district-level implementation plan, which will be critical in allowing for collaboration and coordination amongst schools throughout our district.

In addition, given that current master plan requirements set out how funds will be expended, it is unclear how the implementation plan is different from the master plan. City Schools instead recommends the repurposing of current master plans.

- City Schools opposes the requirement for implementation plans to include a community based needs assessment conducted in partnership with a local capacity building organization. Instead, local school systems should be given the autonomy to decide whether they wish to partner with outside organizations, as many larger systems may already have the capacity to conduct their own needs assessment.
- City Schools remains concerned by the requirement to include in the assessment community partners located by geographic proximity to the school. As noted previously, Baltimore City is home to more students living in poverty than any jurisdiction in the state. Given the sheer density of so many high-poverty schools in such a restricted geographic area, it is unrealistic to expect nonprofit community partners to be able to adequately address all students' needs and unreasonable to restrict the use of funding to local options that simply would not have the capacity to support all of our schools. This shortage of resources is already a challenge throughout Baltimore City and while we are constantly working to establish partnerships and expand capacity with our partners, this is difficult work that requires more than a funding mandate to make it reality.

The overarching charge of the Kirwan Commission is to ensure Maryland's public school system can adequately meet the needs of all students. Any model that is based on a cadre of individual nonprofit providers maintaining more than 100 separate implementation plans is likely to create bureaucratic havoc which will ultimately lead to barriers to providing much-needed service through well-intentioned but misplaced directives.

- While City Schools recognizes the challenges of creating meaningful and useful accountability measures, especially when it comes to factoring in poverty, we remain concerned by the lack of detail regarding the work group's suggested accountability indicators – i.e., number of students served and not served, time to receive services, attendance, enrichment opportunities, reduction in disciplinary actions, student and principal satisfaction, and meaningful family involvement.

In addition to needing clarification regarding how these indicators will be defined and measured – especially in relation to accountability measures as defined in the state's ESSA plan – the Commission should clarify at the outset the need for fair comparisons of schools. Specifically, any comparisons of schools should be made with consideration to

the student population (e.g. schools with similar poverty rates, special education student populations, etc.).

“Like school” comparisons allow for more accurate and fairer comparisons that could result in the identification of school success models and/or best practices that can be shared to accelerate the rate of school improvement across the state to address the achievement gaps that persist among some sub-groups. Any accountability system that does not consider these complexities may be misleading when it comes to a school’s overall performance as it relates to meeting the needs of all students.

- City Schools is concerned that establishing additional reporting requirements which take time and resources to produce will be counterproductive to the Commission’s goals. Similarly, while the recommendations note districts will be required to report annually on their progress on indicators, it is unclear whether support will be provided to allow for the hiring of additional staff that will undoubtedly be needed to manage the tracking and reporting requirements. Clearly defining the accountability measures and data points that reasonably align with the stated goals of the working group is essential and should be done in partnership with local school districts to ensure the reports are helpful, meaningful, and not simply a bureaucratic burden.

Special Education Students

- 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 funds to cover the cost of serving our students with special needs.
- City Schools understands the Commission intends to propose a single placeholder weight for special education until the completion of the independent study as required by HB1415 of Session 2018. While certainly an improvement over the existing 0.74 weight in current law, the recommended “stop-gap” weight of 2.18 is still expected to fall significantly short of what City Schools spends in this area. We look forward to a more robust discussion of the most appropriate special education weight once the study recommendations are presented in December 2019.
- As noted previously in City Schools’ written response to the first three working group recommendations, 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. For this reason, City Schools remains opposed to categorical funding.

English Language Learners

- While City Schools generally appreciates the concept of increasing the new EL weight in order to provide for a family liaison position, we remain opposed to state mandates that require the hiring of certain positions, as we firmly believe such decisions should be

made at the local level. In addition, it remains unclear how the Commission expects to determine which schools would be eligible for such a position, what the job would entail, and which staffing ratios would be required.

- With regards to implementation and the concern that changes at the federal level may result in the undercounting of students for compensatory education purposes, City Schools shares this concern wholeheartedly. As noted above, the undercounting of immigrant students is already a serious challenge in Baltimore City, and one that we hope the Commission will take steps to address.

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 let us know if we can provide additional information as the Commission prepares to finalize its recommendations in the months ahead.

Sincerely,



Sonja Brookins Santelises, Ed.D.
Chief Executive Officer

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

enc: City Schools Chart: Services Requiring A Concentrated Poverty Weight