



December 12, 2006

Nancy Navarro, President  
Board of Education  
Montgomery County Public Schools  
850 Hungerford Drive  
Rockville, MD 20850

Dear President Navarro:

MCCPTA appreciates this opportunity to comment on Policy IEB: Middle School Education. Please share this letter with the other members of the Board of Education. The following comments were endorsed at our Delegate Assembly on November 28, 2006.

These comments are divided into two sections. The first contains general comments on the Policy IEB and the Middle School Reform efforts. The second section contains specific comments on language contained in the policy.

**General Comments:**

The Board's policy committee previously stated its intention to extend the comment period for Policy IEB. This did not happen, one Board member reported, due to staff error. Aside from the obvious question of why Board members were unable to rectify the error by extending the comment period, we question why the Board would not give parents and the community extended time to review both the Middle School Reform Report and the policy revisions simultaneously.

One answer will surely be that policy drives programs. However, the Middle School Reform Steering Committee has been working for quite a while without a revised Middle School policy to guide it. Indeed much of this work has been completed with no input to the sub-committees regarding the proposed policy changes. It would be a stretch to say that the revised policy has been guiding this effort for the past few years and it might be more accurate to say that the work of the sub-committees has been to provide input for the policy revisions.

For several years parents have yearned for substantive middle school reform. They have been anxiously awaiting the recommendations of the Middle School Reform Steering Committee as well as the revisions to Policy IEB. MCCPTA has been represented on the Steering Committee for close to two years. There have been no interim reports or other documents which could be released to MCCPTA or the broader parent community. Information shared and input given on middle school reform has been informal since there is no official list of recommendations on which to comment though hundreds of recommendations have been discussed within the Committee. The Committee had a preliminary list of recommendations in early June but opted not to release them to the public.

Now it is time to submit comments on this revised Policy IEB and we have very little information with which to evaluate the proposed policy changes and to place them into the proper context. We have been able to deconstruct the meaning of many sections of the revised policy based on explanations from our representative to the Steering Committee and those to the sub-committees, yet we have many remaining questions regarding definitions and interpretations and the intent of the Board's vision; these follow in the second section below. The comments and questions were generated by several MCCPTA committees and were presented to our delegates who engaged in thoughtful discussion, added some points of their own, and endorsed the comments contained in this letter.

MCCPTA strongly believes that the Board should not have put Policy IEB out for public comment before the Middle School Reform Report was issued, or even completed. It is our understanding the Middle School Reform Report is currently a draft that is missing numerous specifics. It might be fair to say that the current driver for the Middle School Reform Report is the need to submit a specific budget request to the County Council in February rather than the revised Policy.

We question how Board members can meaningfully evaluate the suggested policy language when they are also waiting for the Middle School Reform Report.

### **Comments on Specific Policy Language:**

Lines 32-38: This paragraph states, "The Board considers partnerships with parents, families, and the community vital components of the educational process. It recognizes that enhancing and maintaining such partnerships, particularly with groups reflecting the diversity of the community, is an effective way to promote academic excellence as well as support the intellectual, social, emotional, and physical growth of students in their middle learning years." To include the phrase "particularly with groups reflecting the diversity of the community" within this paragraph implies that partnerships with diverse community groups are more important to academic achievement than are partnerships with parents. MCCPTA believes that parents are the primary stakeholder in their child's academic achievement and urges language that recognizes this.

Lines 48, 376, and 386: In each of these lines, the Policy refers to “highly qualified” staff and/or leadership. “Highly qualified” is a term which means staff members have fulfilled specific certification criteria defined by NCLB. MCCPTA believes that staff should be high quality too. Teacher high quality characteristics have been defined by such groups as the Education Trust. We suggest replacing the phrase “highly qualified” with “*high quality, highly qualified*” wherever it occurs.

Line 82: “Promote cultural competence amongst students...” We would like this phrase defined in the context of this Policy.

Lines 103-109: This paragraph is the introduction to the section on Curriculum, Instruction, and Assessment. The sentence on technology (lines 106-109) should be moved to a new separate section on technology or be included as a subsection of this entire part (2). While MCCPTA understands that MCPS must include technology in this policy as part of an outside mandate, we do not think that it belongs in the introductory paragraph to this section. As the only item mentioned in this paragraph it assumes an importance which is not warranted.

Line 115: A new subsection (a)(1) should be inserted to restore language from the old IEB policy: “*The following curricular areas: English/language arts, mathematics, social studies, science, foreign language, physical education, art, dance, drama, music, technology education, and home economics.*” Parents are most concerned that music and the arts are included as necessary curricular areas. Policy IFA: *Curriculum* is referenced here, but this policy does not have mention of any of these specific curricular areas. All the following items (1)-(5) should be renumbered to reflect the addition of a new (1).

Lines 115-117: The current section (1) should be amended to read: (2) “The written curriculum, *including a sequenced and systematic higher level enriched and accelerated curriculum for reading/language arts, science, social science, and mathematics in every grade*, as presented in the curriculum framework and in the curriculum guides.” This is consistent with a resolution passed by our Delegate Assembly in spring 2006.

Lines 142-150: The language “Programmatic and instructional decisions...will be based on a variety of factors, including...analysis of student performance data in relation to established benchmarks” needs to be clarified in the context of this policy. This section must not be used to eliminate electives and enriched and accelerated instruction from low-performing schools and we urge the Board to state that it does not intend the paragraph to be interpreted in that manner.

Lines 152-161: These two subsections should be moved to the new section on technology.

Lines 152-154 read “Students will utilize technology to demonstrate mastery and monitor their own academic progress.” It is not clear whether students are to demonstrate mastery of technology or other subject areas. This sentence needs to be clarified in the context of this policy. In addition, while many MCCPTA members endorse the full implementation

of OARS, and likely many parents would want their own children to be able to utilize this, or a similar system, to self-monitor, MCCPTA questions whether this goal is important enough to warrant inclusion in this policy.

Lines 156-161: “In order to enable students to function and compete in a global society and prepare them for using technology across the curriculum all students, particularly those who reflect the diversity of the community, must have access to and instruction in technology.” This section seems to suggest that MCPS should make an effort to provide computer/technology access to students with financial constraints that prevent them from accessing technology outside of the instructional day. We suggest deleting “particularly those who reflect the diversity of the community” and replacing it with a statement regarding financial constraints to access. Access to technology is not a racial or ethnic issue, but an issue of money.

Line 184: Add a new item (8) by restoring the language: *“Both homogeneous and heterogeneous groups are appropriate.”*

Line 184: Add a new item (9) *“Instructional programs shall be implemented such that each child is challenged and supported to meet his or her academic potential.”*

Line 184: Add a new item (10) *“Instructional programs for all students shall make pervasive use of sustained student inquiry into real-world matters through projects and other methodologies used in magnet programs.”* This subsection is drawn from the *MCCPTA Resolution on Wider Use of the Methodologies Used in Magnet Programs* which was passed by the Delegate Assembly in January, 2006.

Lines 203-219: Subsections (a), (c), (d), and (e) are taken verbatim from the referenced policy IKA: *Grading and Reporting*. No sections of the other referenced policies are included in Policy IEB.

Line 203 reads “Fair representation of a student’s performance on a variety of measures over time.” The word “fair” needs to be defined within the context of this subsection. Does this mean fair as a qualifier between good and poor or does this mean just? If the meaning of fair in this sentence is just, then what constitutes a just representation?

Line 224 reads “Reassessment procedures are fair, promote effective teaching and learning, and are manageable within the instructional cycle.” The word “fair” needs to be defined within the context of this subsection.

Lines 230-236: “The organizational structure of a high achieving middle school will optimize time for learning and facilitate opportunities....Effective organizational structures shall include:” While we assume the Board intends “high achieving middle school” as a goal for each school and intends that the list of effective organizational structures that follows this paragraph will lead to that goal, the current language of this paragraph implies that the list of organizational structures applies only to high achieving middle schools and any other middle school need not utilize these structures. Given that

a significant portion of our middle schools are not currently high achieving as evidenced by not making AYP, we suggest altering the language to make it clear all middle schools should include these organizational structures in order to become high achieving.

Line 254: The phrase “(b) Smaller learning communities” needs to be defined in the context of this policy.

Lines 277-278: The phrase “encourage a more complete engagement in school” needs to be defined within the context of this policy.

Lines 284-291: MCCPTA supports alternative language A. We also suggest replacing “ensure their success” so the last sentence reads: “For those students who are not academically eligible, the school will provide the necessary academic support to *meet or exceed the standard for academic eligibility.*”

Lines 337: Add another subsection to read: At the school level, there must be processes in place for: “(f) *Providing professional development for school staff on effective practices and techniques for instructional differentiation.*” This professional development should include training on differentiation for highly able learners as well as for students with IEPs and/or accommodations within a general education setting.

Lines 346-348: This partnership will benefit from: (a) “Opportunities for parents and families to increase their ability to support the academic achievement of their children.” This subsection should be deleted as it seems to imply that parents need to be taught. Schools should focus on educating students not their parents. The focus regarding parents should be on partnerships and this issue is covered in later sections.

Lines 350-353 read “Opportunities for parents to provide input, feedback, and involvement in decision making regarding the academic, social, and co-curricular, programs.” Co-curricular needs to be defined within the context of this sentence.

Line 355: Add the words “and timely” so that line 355 reads: This partnership will benefit from: (c) “Frequent *and timely* two-way communication between families and ...”

Lines 391-392: At each individual school, staff will: (c) “Create opportunities for professional learning communities to improve teaching and learning.” This subsection (c) should be moved to come after line 337 so that the central office has responsibility for this rather than individual schools.

Lines 404-405: Add the word “*student*” so that the phrase reads “At each individual school, staff will (g) Reflect, to the extent possible, the diverse *student* population of MCPS.”

The delegates also urge the Board to make sure the policy is assessed and implemented at all middle schools including through the school improvement process.

As always MCCPTA appreciates the opportunity to comment on the proposed changes to Policy IEB: *Middle School Education*. We look forward to working with the Board on Middle School Reform.

Sincerely,

Jane de Winter  
President