

Suggested Amendments to Policy 1080

submitted by **Chinese American Parent Association of Howard County**

1. Introduction

The Chinese American Parent Association of Howard County (CAPA) has been committed to improving educational equity in Howard County since its establishment. We consider Policy 1080 to be an essential step towards implementing the goal of educational equity and support BOE's leadership in drafting and improving this policy.

State regulation "Code of Maryland Regulations, Chapter 13A.01.06. Educational Equity" requires each school district to create an educational equity policy. As the regulation stated:

The purpose of this chapter is to establish as a matter of policy and priority that: A. Each Maryland public school will provide every student equitable access to the educational rigor, resources, and supports that are designed to maximize the student's academic success and social/emotional well-being; B. Each local school system's procedures and practices provide for educational equity and ensure that there are no obstacles to accessing educational opportunities for any student; and C. Achievement will improve for all Maryland students and achievement gaps will be eliminated

CAPA believes that each individual should be provided with equitable access to resources, services, and opportunities; and should be treated equally and fairly regardless of individual characteristics. Evaluating educational statistics by student groups may hide unique individual characteristics within groups. We believe that the state regulation mandates the school systems to ensure educational equity for EACH individual regardless of the group and academic spectrum he/she belongs to. The proposed HCPSS Policy 1080 should be consistent with the state policy.

To help improve Policy 1080 so that it will provide guidance and clarification to HCPSS practices, and to ensure that Policy 1080 is aligned with state regulations, we respectfully submit the following recommendation on revision.

The following revisions are based on the current BOE draft dated July 9, 2020.

2. Revisions

- Section I second paragraph
 - 1) The Board acknowledges ~~systemic racism, implicit and explicit bias, institutional barriers, and other discriminatory practices~~ that **multiple factors including individual characteristics contribute to disparities in educational outcomes** ~~cause inequitable outcomes~~ for students.
 - Proposed changes: delete the stricken-through text and add the highlighted text.
 - Justification: In compliance with the state regulation Code of Maryland Regulations 13A.01.06. "Each Maryland public school will provide educational equity to ensure that there are no obstacles to accessing educational

opportunities for any student. Achievement will improve for all Maryland students and achievement gaps will be eliminated.” In order to effectively improve achievement for all Maryland students, we need to find the true obstacles for all students. The original sentence focuses on only one aspect and does not take all individual characteristics listed in the state regulation into consideration . .

- 2) “As such, the Board is committed to providing all students with a dynamic and relevant educational program that nurtures their social/emotional well-being, and affirms their identity and experience, in order to maximize each student’s individual potential.”
 - Proposed changes: change the sentence to “As such, the Board is committed to providing every student with equitable access to the educational rigor, resources, and supports that are designed to maximize the student’s academic success and social/emotional well-being and to view each student’s individual characteristics as valuable.”
 - Justification: align with the language in the state regulation Code of Maryland Regulations 13A.01.06.

- 3) “We mandate addressing disparities in educational outcomes as a priority in each school, including but not limited to, **access to leadership positions, sports teams,** advanced coursework, identification for specialized services, discipline, suspension/expulsion practices, achievement, and graduation rates **due to individual characteristics** ~~between student groups.~~”
 - Proposed changes: delete the stricken-through text and add the highlighted text.
 - Justification: Use “individual characteristics” instead of “student groups” to align with the language in the state regulation Code of Maryland Regulations 13A.01.06, which gives a clear definition of the term. The definition of “educational outcome” needs to be broader and more inclusive.

- Section II

The purpose of this policy is to establish expectations ~~related to the identification and elimination of disparities in education outcomes.~~ **and strategies for the achievement improvement for all students and to eliminate achievement gaps.**

- Proposed change: delete the stricken-through text and add the highlighted text.
- Justification: a) add “strategies.” This policy is more than expectations. b) Use the term “achievement gaps” instead of “disparities in education outcomes” to align with the state regulation Code of Maryland Regulations 13A.01.06.

- Section III

Section III.A.2 ~~“This curriculum will use differentiated approaches and resources to meet the needs of every student in accordance with Policy 8000 Curriculum.”~~

- Proposed change: Delete this sentence.
- Justification: the term “differentiated approaches” was not defined in this policy. It was mentioned but not defined in Policy 8000. If this sentence is important enough to be included, we need to specify what the “approach” candidates are and how these approaches are chosen. For example, are we talking about providing different cultural contents based on the students’ cultural backgrounds? Or are we talking about providing a different amount of cultural curriculum depending on students’ course load?

Section III.A.4 “A student’s English proficiency, disability status, ~~perceived academic ability~~ and/or social identifiers will not limit access and opportunity.”

- Proposed change: delete the stricken-through text
- Justification: this term is too open for interpretation. To include this term, a precise definition of “perceived academic ability” should be given, and an alternative “real academic ability” should be provided. We suggest leaving this issue for further study.

Section III.B.5: Establish a diverse, equitable, and inclusive student population at all schools. As such, Policy 6010 School Attendance Areas, utilizes demographic data as a factor for setting school attendance areas, **given that such implementation does not impede any student’s ability to acquire educational equity as defined in the Code of Maryland Regulations, Chapter 13A.01.06.**

- Proposed change: add the highlighted text.
- Justification: Make sure that this implementation aligns with the state’s regulations.

Section III.B.6 “Evaluate and continuously improve classroom placement practices and student scheduling to ensure that ~~diversity exists~~ **individual characteristics are fairly reflected, and equitable educational opportunities are provided to every student** ~~in all learning environments.~~”

- Proposed changes: delete the stricken-through text and add the highlighted text.
- Justification: align with the language in the Code of Maryland Regulations, Chapter 13A.01.06. Also, the term “learning environments” is not defined in this policy. For example, does “diversity exists in all learning environments” mean that each class, club, or sports team needs to have a certain proportion of students with each social identifier? On the other hand, educational opportunities are well defined in the state regulation and reflect the same principle as the original statement.

Section III.B.8 Identify and eliminate disproportionality in discipline practices by uplifting and nurturing healthy relationships, creating a just and equitable learning environment, repairing harm, and responding effectively to conflict. Regardless of social identifiers, consequences are fair, equitable, consistent, and reflective of a restorative culture.

- Proposed change: Evaluate current discipline practices to ensure every student is treated fairly with no explicit and implicit bias. The schools should uplift and nurture healthy relationships, create a just and equitable learning environment, repair harm, and respond effectively to conflict. Regardless of social identifiers, consequences are fair, equitable, consistent, and reflective of a restorative culture.”
- Justification: align with the language in the Code of Maryland Regulations, Chapter 13A.01.06.

Section III.C.1 “Intentionally recruit, employ, promote, support, and retain a diverse workforce of highly qualified educators **and leadership teams** that reflect the diversity of the student population. In accordance with Policy 7000 Workforce Diversity, an innovative recruitment and retention Workforce Diversity and Inclusion plan for **highly qualified teachers and members of the leadership teams** of color and other diverse staff, is a priority for HCPSS. “

- Proposed change: add the highlighted text.
- Justification: diversity in the leadership team is essential to provide mentoring and advocacy for a diverse workforce. It also helps to attract a diverse recruit pool. The current HCPSS leadership diversity has significant rooms for improvement. The term “highly qualified” is worth reporting, to ensure that the teacher’s qualifications and credentials should be equally considered and should not be undermined in recruitment, promotion, and retention.

Section III C 3 “Prioritize ongoing professional learning experiences focusing on **individual characteristics** ~~factors influencing educational equity, such as cultural proficiency and responsiveness, implicit bias, explicit bias, and systemic racism.~~ “

- Proposed change: delete the stricken-through text and add the highlighted text.
- Justification: In compliance with the state regulation Code of Maryland Regulations 13A.01.06. “Each Maryland public school will provide educational equity to ensure that there are no obstacles to accessing educational opportunities for any student. Achievement will improve for all Maryland students and achievement gaps will be eliminated.” All listed individual characteristics should be taken into consideration.

- Section IV

Add a section: The Board of Education will set up a citizen’s committee on educational equality, to consist of representatives from the various community groups and HCPSS. This committee will advise the Board on the practices and implementations of this Policy by HCPSS and the actions that the Board can take to advance the goal of educational equity.

- Proposed change: Add a section that reads: **“The Board of Education will set up a citizen’s committee on educational equality, to consist of representatives from the various community groups and HCPSS. This committee will advise the Board**

on the practices and implementations of this Policy by HCPSS and the actions that the Board can take to advance the goal of educational equity.”

- Justification: while Policy 1080 sets up a framework for educational equity, much work is needed in implementation to ensure our goal is realized. Citizen involvement in the process is critical. The Board and the proposed citizen’s committee provides a conduit for the Howard community to help and monitor the process.

Section IV.G “The Office of Diversity, Equity, and Inclusion (ODEI) will provide training and development aligned to its educational equity goals through district-level and school-based level professional learning opportunities. The cost of these training activities will be reflected in the annual budget equity allocation described in Section IV.C.”

- Proposed change: add the highlighted sentence
- Justification: We should identify equity-related training in the pool of professional training expenses for better accountability.

- Section VI

Section VI C

Diversity – Recognizing, accepting, and respecting that individuals come from many different life experiences with various frames of reference and perspectives. While diversity values unique perspectives and individual differences, it also values the commonalities we all share. Diversity includes, but is not limited to, (a) Ability (cognitive, social/emotional, and physical); (b) Ethnicity; (c) Family structure; (d) Gender identity and expression; (e) Language; (f) National origin; (g) Nationality; (h) Race; (i) Religion; (j) Sexual orientation; and (k) Socio-economic status. ~~race/ethnicity, gender, gender identity, socioeconomic status, sexual orientation, language, culture, religion/ beliefs, mental and physical ability, age and national origin.~~

- Proposed changes: delete the stricken-through text and add the highlighted text.
- Justification: In compliance with the state regulation Code of Maryland Regulations 13A.01.06.

Section VI:

- Proposed change: Add definition of individual characteristics:
 - “Individual characteristics” means the characteristics of each individual student, which include but are not limited to: (a) Ability (cognitive, social/emotional, and physical); (b) Ethnicity; (c) Family structure; (d) Gender identity and expression; (e) Language; (f) National origin; (g) Nationality; (h) Race; (i) Religion; (j) Sexual orientation; and (k) Socio-economic status.
 - Justification: this is the term used and defined in the state regulation Code of Maryland Regulations 13A.01.06.

Section VI:

- Proposed change: add definition: “Educational opportunities - all students have access to rigorous, well-rounded academic programs and experiences that enrich their educational career and prepare them for academic and career success.”
 - Justification: this is the language from the state regulation Code of Maryland Regulations 13A.01.06. The term “educational opportunities” was used in Sections III.A.6 and VI.K.
- Implementation, Section III.A
 - Implementation Section III.A, see below
 - Proposed change: Add the following text: “The HCPSS annual budget will report the cost and key performance indicators (KPI) of these training efforts.”
 - Justification: we need to ensure that these training efforts are effective in promoting and improving equity.

Implementation, Section III.C ~~“ODEI will work collaboratively with HCPSS offices to intentionally uplift diverse role models, so that all students see themselves and the global society represented to~~ **foster a diverse workforce so that it can serve as role models to all students.”**

- Proposed change: delete the stricken-through text and add the highlighted one.
- Justification: the original statement is confusing. The proposed change represents our understanding of the intention. Also, “work collaboratively with HCPSS offices” is not appropriate because ODEI is also an HCPSS office. And the necessity of collaboration is obvious.

Implementation, Section III.D ~~“ODEI will partner with parent and community groups organizations and government agencies to support mutual equity goals~~ **equity goals through regular meetings, town halls, and other communication channels.”**

- Proposed change: delete the stricken-through text and add the highlighted ones.
- Justification: the meaning of “mutual equity goal” is not clear. We also need to codify the partnership with tangible mechanisms.

- Implementation Section IV
 - Implementation Section V.A, see blow
 - Proposed change: add the following items:
 - Refine the set of metrics listed in 1 above to reflect educational opportunities and excellence available to students.
 - Collect equity measures beyond educational outcome, including but not limited to: student experience with school culture, student access to instructional help, resources, and guidance from HCPSS outside of classrooms, social services, internship, and other learning opportunities, etc. These measures can be collected through informal ways such as surveys and interviews.

- The root cause analysis described in point 2 above will include a broad set of sociological factors that a student faces, both inside and outside of the school.
- Justification: how we measure educational equity is critical to how the values and strategies stated in Policy 1080 will become a reality. Therefore, it is worth investing resources in the data collection and research to provide insights into the current situation and the best way forward.

Implementation Section V.C “Annual reporting of leadership and staff data to the Board will include staff demographics...”

- Proposed changes: add the highlighted text.
- Justification: diversity of the district and school leadership teams is of critical importance to educational equity.

- Implementation Section V

Implementation Section V.C, see below

- Proposed change: add a section: “All studies, analyses, and plans described in the above subsections will be shared with the Board of Education and made public through the latter.”
- Justification: This is a part of public accountability. Since Policy 1080 is new and is (perhaps justifiably) vague in many provisions, the public needs to be informed about the implementation plan and supporting data.