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Commission on Innovation and Excellence in Education  
Room 121, House Office Building  
Annapolis, Maryland 21401

Dear Dr. Kirwan:

On behalf of the Maryland State Education Association and our 74,000 educators, I appreciate the work that you and the Commission on Innovation and Excellence in Education have done thus far. Over the course of the last two years, MSEA has engaged tens of thousands of our members in conversations around their needs and priorities for funding and innovation. We will continue to advocate for those priorities and, in that regard, want to share some specific edits and concerns based on the workgroup reports received to date.

### **WORKGROUP 1**

We strongly support the goal of expanding pre-Kindergarten access to three and four year olds. The model outlined by the workgroup relies on community providers, even protecting a market share of up to 50% of all slots. All of the funding is public, yet the recipients and their staff would work under different conditions which should be equalized as the expansion takes place. As the full commission considers the recommendations and assumptions from Workgroup 1, we hope you will make adjustments to address our concerns as outlined below.

#### *Element 1A*

1. **As elementary schools are approved for construction and renovation projects, design expectations should account for the inclusion of three and four-year old programs.** Adding this assumption will not jeopardize the current role of community-based providers, but will better position the state for expansion to universal pre-K.
2. **Remove the requirement to reserve so many pre-K slots for community-based providers.** Publicly funded pre-K should be in our public schools. Several school districts are already above and beyond having 50% of four-year olds in a public school, that requiring a district to make a change in that arrangement would be incredibly disruptive. At a minimum, any community-based guarantee should be done on a regional or statewide level and not on a district-by-district level.
3. **Strengthen the non-discrimination provisions related to community providers receiving public dollars to guarantee no discrimination based on religion and expand the protection from just admissions to also include retention decisions.** The current language does not provide adequate protections to students or their families and needs to be expanded before significant public dollars and community-provider slot guarantees are committed.
4. **It is a dangerous precedent to charge for public school.** The sliding scale is a prudent way to phase in expansion of pre-K, but we believe it is important to be on the record against the very notion of charging a fee to access a public school provided program.

#### *Element 1B*

1. **Empower LEAs to have oversight of all aspects of pre-K expansion, including in the hiring of all staff for the public school and community-provider programs.** Throughout this workgroup, LEAs and MSDE are expected to provide support for community providers, yet when it comes to teaching standards, pay considerations, and placement on a career ladder, community providers are allowed to operate outside of this oversight. This is not fair to the credentialing authorities and will create a two-tiered system for students and educators who should be able to expect uniformity in publicly-provided pre-K programs. The resolution to this problem is to have the LEAs serve as the employer for all pre-K teachers.

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*Element 1C*

1. **All action related to a Kindergarten assessment should be delayed until a panel of Kindergarten teachers, including at least 40% of the consulting teachers selected by MSEA, is charged with recommending a diagnostic-based assessment for all Kindergarten students.** MSEA has raised concerns on numerous occasions about the KRA and the undue burden it places on Kindergarten teachers, in large part because it has changed forms from a test designed to evaluate pre-K programs to one purportedly designed to provide diagnostics on individual students. The KRA does not have confidence of Kindergarten teachers. They use other assessments to provide diagnostic data and they use their own professional skills and judgment to evaluate students and help create their learning pathways. These tools are less disruptive than the KRA, and turn data around much faster than the KRA. Diagnostic data is important, but teacher-selected assessments on top of locally-mandated assessments on top of the KRA is testing overload for our youngest learners. We should have one assessment that meets the needs of teachers and provides the data the Commission is looking for; and we should trust teachers to develop that assessment.

**WORKGROUP 2**

The topline goals charged to this workgroup are essential for the improvements in our schools. MSEA strongly supports efforts to increase teacher salaries, expand planning time, and improve the training and supports for educators early in their careers. The pathway to reach these goals is unclear as of this writing. The career ladder and salary improvements have not yet been vetted. It is impossible for MSEA to take a formal position on these elements as a whole until details of the various career paths are known. There needs to be a much clearer understanding of how the career ladder will affect the existing workforce. We need to know how many details and adjustments to the ladder will be subject to collective bargaining. As the workgroup continues its work to address some of these details, here are other specific notes and changes we hope you will address before finalizing the report.

*Element 2B*

1. **Add and empower the Professional Standards and Teacher Education Board (PSTEB) to approve the licensure standards and corresponding tests required for teachers.** PSTEB is charged with advising the State Board of Education on teacher standards and should specifically have a role in finalizing the tests and other details of this element.

*Element 2C*

1. **Change this element to read as follows: “Expand the Maryland Teacher Fellows scholarship program to support recruitment efforts for diverse candidates to teach in high-need schools.”** MSEA supports the Maryland Teacher Fellows scholarship, and if that is the intent of this element, then it should be clear that is the incentive being promoted and not an incentive pay structure to teach in high-needs schools. This approach will bolster local efforts to create a more diverse workforce and expand the opportunity of at-risk students to be taught by teachers who more closely align with the demographics of the school.
2. **This effort needs to be coupled with changes to working conditions.** Research shows that educator mobility rates in all schools, including high needs schools, are tied to educators’ sense of efficacy in decision making and adequacy of support. Ultimately, we hope Workgroup 4 recommendations will include more expansive efforts to reduce class sizes and create a more collaborative and supportive work environment with additional support services and paraprofessionals.

*Element 2E*

1. **Add MSEA to the steering committee to support this public relations work.**

Element 2F

- 1. Update projections on state-led teacher salary increases in the next three years as the state transitions to a career ladder-based set of pay raises.** As noted in the start of these Workgroup 2 notes there are a lot of details and assumptions to test, but one thing that is clear is that the state will need to be more aggressive than raising salaries by 10% over three years in order to meet recommendation #27 from the preliminary report earlier this year (*During the phase-in period for the career ladder and while Maryland is developing and implementing an increase in certification standards, average salaries of Maryland teachers should be brought to the average of the two comparison states, New Jersey and Massachusetts, whose demographics and economy most resemble Maryland.*)

Here's how MD teacher salary would need to grow to meet preliminary recommendation for initial phase-in:

YEAR	MD AVG SALARY	PERCENT CHANGE	NJ/MA AVERAGE	MD/BENCHMARK AVG
2009	\$64,005	1.84%	\$66,932	95.6%
2010	\$63,960	-0.07%	\$68,476	93.4%
2011	\$63,634	-0.51%	\$69,019	92.2%
2012	\$64,248	0.96%	\$69,534	92.4%
2013	\$64,546	0.46%	\$71,043	90.9%
2014	\$65,477	1.44%	\$72,218	90.7%
2015	\$66,456	1.50%	\$72,926	91.1%
2016	\$68,357	2.86%	\$73,862	92.5%
2017	\$69,627	1.86%	\$75,663	92.0%
2018	\$71,270	2.36%	\$77,511	91.9%
2019	\$72,952	2.36%	\$79,407	91.9%
2020	\$76,023	4.21%	\$81,352	93.4%
2021	\$79,224	4.21%	\$83,348	95.1%
2022	\$82,559	4.21%	\$85,395	96.7%
2023	\$86,035	4.21%	\$87,496	98.3%
2024	\$89,657	4.21%	\$89,651	100.0%

Black is data we have. Blue is estimated data that is already locked-in but we do not have yet. Green is projected for Kirwan years in order to reach the average of New Jersey and Massachusetts in five years. The increases will need to be more significant if the Commission is going to meet the NJ/MA averages in three years.

Element 2G

- 1. We are withholding further comment on this element until further workgroup deliberations take place.** This element causes the greatest concerns for the existing workforce. As workgroup discussions continue, we believe it is imperative that, at a minimum, these questions are answered/issues addressed:
  - How is the existing workforce placed on the career ladder?

- Track several different types of employees up and across the ladder and compare to their years of service and salaries under existing salary scales. Is the new system aggressive and obviously preferable to the existing system that it will inspire confidence in the existing workforce to make such a dramatic shift?
- How does this career ladder work for early childhood teachers versus elementary versus middle school and versus high school, as there are more options on a career ladder in high schools than the other schools?
- How does the ladder work for smaller districts or when there is not availability at higher rungs of the ladder because of a failure in steady and consistent transition of people currently on higher rungs?
- What happens to teachers who achieve National Board Certification but are not renewed?
- What happens to the salaries of teachers who move up the teacher leadership track, but later want to return to Level 3?
- Which elements of the ladder and further salary increases are left to collective bargaining?

#### **MISSING ITEM**

1. **Add a recommendation for a living wage floor for education support professionals.** MSEA will not be able to support a final Commission report that remains silent on one-third of the educator workforce in our schools: education support professionals. While it is possible to wait to include an acknowledgment of increasing pay for education support professionals until the formula elements are discussed and finalized, this would signal an underappreciation of these educators. We believe the Commission should begin to add language in either Workgroup 2 or in other sections of the report to recommend a living wage pay floor for the non-teacher and non-administrative employees who make our schools run and keep staffing ratios at more manageable levels.

#### **CONCLUSION**

MSEA is excited about the once-in-a-generation opportunity afforded by the work of the Kirwan Commission. This undertaking is not without risk to the existing workforce and an exacerbation of a teacher shortage that already threatens our schools. These risks require us to be cautious as we implement any recommendations. As the largest representative of educators in the state, we take our role as a partner in this work seriously and will continue to engage in good faith. We hope the Commission will do the same and view the opinions and recommendations outlined in this memo as those of the educators struggling each day to lead their profession and meet the needs of students in every classroom and school in the state.

Thank you for the work you are leading and ensuring that educator voice is a part of deliberations and the Commission's final work product.

Sincerely,



Cheryl Bost, MSEA President