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Dr. William (Brit) Kirwan, Chair
Commission on Innovation and Excellence in Education
Room 121, House Office Building
Annapolis, Maryland 21401

Dear Chairman Kirwan,

On behalf of our twenty-four local school superintendents and as President of the Public School Superintendents' Association of Maryland (PSSAM), I want to thank you and the Commission members for your commitment, dedication and the time you have devoted to recommending guidelines and strategies that will ultimately redefine our current educational policies and practices. We understand your charge has been to review the current funding formula and you are currently working in work groups to develop policy recommendations and strategies that will substantially close the gap between Maryland's top performing students and those who fall behind their peers. We are anxiously awaiting the costing-out of the work groups' recommendations, including the implementation of these recommendations over the next ten years. Please keep in mind that many of our jurisdictions remain at the local maintenance of effort level of funding each year. In addition, many jurisdictions are also facing decreased revenue sources due to declining enrollment, and the smallest jurisdictions are uniquely challenged due to economies of scale. We hope the Commission will keep these unique challenges at the forefront when considering increases in local education aid.

As you prioritize implementation, I want to reiterate one of our top education priorities has been to support funding the expansion of Pre-Kindergarten for all Maryland's 4-year old children. We also fully support quality early childhood education for our most vulnerable 3-year olds. We hope this will be one of the first policy initiatives the Commission initiates. As educators, we recognize and validate the research that supports early childhood education, including the future impact it will have on our students to stay on track, for high school graduation with the goal to become college and career ready. From a fiscal standpoint, the return on our investment is well worth the added expenditure and should be the Commission's first priority!

We have reviewed the three Working Groups reports, recognizing there are many fiscal, facility and staffing implications that will need to be addressed. However, we would like to offer several comments relative to the implementation decisions included within these documents. I summarized the collective feedback and hope LEA implementation considerations will be helpful as you continue your work.

Early Childhood Education

- The requirement for 50% of PreK seats to be filled in community-based settings may work in some jurisdictions but not in others. We question the mandated percentage and would favor a more flexible approach that could be delivered in either setting.

- If community-based programs receive the federal funding for special education students, will these programs also be bound by the same federal mandates regarding special education students – i.e., IEP meetings, FAPE, etc.? Will community-based programs be willing to assume that level of responsibility?

- LEAs are expected to enter into an MOU with community-based programs to provide PreK services. What is the purpose of the MOU? Is it for oversight, accountability, teacher evaluation? Does MSDE license these providers? It would seem that this needs further clarification. If LEAs are expected to provide oversight of these programs, we will need additional staff to monitor their performance. This needs further clarification.

- LEAs are required to prioritize "child care deserts" for program expansion. It is suggested that we do cross-county programming and reciprocity with border states. Will LEAs be allowed to set up reciprocity agreements or should this be a State function to ensure consistency, COMAR alignment and funding requirements?

- If PreK classroom construction is prioritized by the State, what impact will that have on each LEAs Capital Improvement Plan? Presently, school systems are unable to obtain enough funding to address facility deficiencies, systemic improvements and renovations; therefore, will there be increased allocations for school construction?

- LEAs are encouraged to find "innovative ways" to meet physical space constraints such as utilizing community centers or senior centers. Will COMAR requirements for student safety be waived for these "innovative" spaces?

- Will "participating community-based PreK programs" require administrative computer access to our SIS and Financial System?

- Will "participating community-based PreK programs" require instructional access to computers/technology?

- Will there be an expectation for LEA technical support at the "participating community-based PreK programs"?

- Will there be ongoing funding provided to sustain and support the KRA? Initial grants only provided funds for devices but did not fund replacement or support costs. KRA has been extremely challenging to support across the state.

- Where will the administration of the KRA take place for all of the PreK programs?

- Implementation Decisions; Para 10: State will prioritize construction funds, if available, for additional PreK classrooms. This effectively supplants local prioritization of modernization of older facilities for new construction at a time when critical facilities issues must be addressed.

- There should be explicit language to note PreK programs will be full-day programs not half-day programs?

- What will be the impact on LEAs (# of PreK students, school/ program locations) for transportation planning and will additional funding be provided (# of buses needed likely to increase)? There will also need to be consideration for policies that govern 3 and 4 year olds on the bus; drop off without parents being present?

High Quality Teachers and Leaders

- Will Professional Development ("Teacher Training Programs") address technology-related competencies? It is noted several times that MSDE must increase its capacity to provide technical assistance and support. It is assumed this refers to details of the subject matter; however, specific technology competencies are often overlooked for technical assistance.

- Will Pay Rates be based on competitive industry sector salaries for those vocational/technical teachers including highly qualified Enterprise Information Technology teachers? In order to attract and retain highly competent teachers in their areas of expertise, it will be necessary to compete with industry.

- Will there be any requirements for senior non-instructional related staff for training programs or will requirements that are industry specific be supported (such as HR, Finance, IT, Facilities, etc.)?

- If an out-of-state teacher has not passed the assessments within 18 months of being hired, will there be an opportunity for a conditional certification be provided? (Element 2b)

- Will the pay rate increase relate to positive evaluation status? (Element 2b)

- Will the recruitment efforts be expanded to first and second year college students who excel in critical shortage areas? (Element 2f)

- Will the initiative to recruit teachers and leaders from diverse backgrounds include funding for hiring incentives?

- If a Lead Teacher position is not available, how will a teacher on the Teacher Leadership Track receive increases? (Element 2g)

- Assistant Principals and Principals have numerous administrative duties such as IEP meetings, observation/evaluation, student discipline, etc. Will additional funds be provided for the reorganization of Assistant Principal and Principal duties to include up to 40% of their work hours being dedicated to teaching? (Element 2i)

- Providing "seed grant" money for Professional Development Schools is problematic. If criteria are mandated, funding to support achieving these criteria should also be mandated.

- Will Professor Master Teachers be employees of the IHEs or LEAs? Could a shared position be considered?

College and Career Readiness Pathways

- Will there be a statewide "instructional system" or will it need to be implemented within each of the 24 local "instructional systems"?

- Where will the "online platform" live and how will access and security be managed?

- Will apprenticeship opportunities extend outside of the local county since some counties have limited business and industry?

- For a course that may count for both High School and College credit under dual enrollment agreements: will students utilize one online identity or one for each institution? Will Maryland implement a Federated Student ID that will transfer to Higher Ed?

- Will the new "Career and Technical Education Subcabinet" or "Skills Standards Board" include representation of local IT Professionals?

- It appears that the existing CCC&T Center will be required to "transition" into a Comprehensive CTE High School. This would incur substantial capital investment in the near future as school systems currently contemplate major renovations of the CCC&T.

- What modifications to regular comprehensive high schools are anticipated in order to provide the CTE program proposed? This needs for clarity.

As you will note by our summary of questions, your work has been thought provoking! We want to express our appreciation for your leadership and the work of your Commissioners. We know this has been a daunting task and look forward to continued discussions. We believe your work must ensure all Maryland students are provided with opportunities to access and receive an excellent and equitable education. Again, we thank you for providing thoughtful leadership to the Commission on Innovation and Excellence in Education!

Best regards,
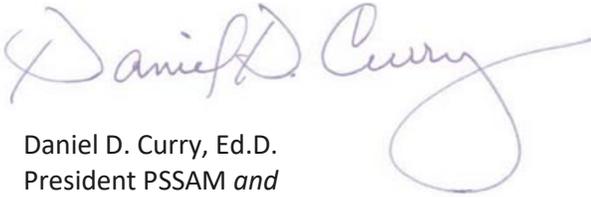
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