



Members of the Commission on Innovation and Excellence in Education,

Thank you for affording Maryland's sixteen community colleges this time to present our responses to the recommendations proposed by Working Group 3, "College and Career Readiness Pathways." As you are aware, Maryland community colleges serve as critical links in Maryland's workforce development chain. We, too, share the Working Group's interest in making Maryland's career and technical education among the best in the world.

Working Group 3 is to be congratulated for providing broad recommendations that community colleges support. We recognize that design and implementation of these recommendations will determine our success moving forward. Unquestionably, if fully supported, the State will take a quantum leap forward in ensuring that future high school graduates will be afforded the opportunity to compete with students globally. However, as the Commission moves forward, Dr. Ray Hoy and I, representing the Maryland Association of Community Colleges, are prepared to bring several issues to the Commission for consideration.

Post College and Career (CCR) Pathways - Funding

In Element Detail 3e, we applaud the recommendation for no cost Associate's Degree options in both traditional transfer and CTE programs. This will be the only way to ensure that all Maryland students have an equal opportunity for success. However, we find the statement that "the State cannot be expected to pay both the high school and postsecondary institution for the same offering, ..." to be misguided because it does not take into account the following realities:

First, funding both sectors is the current law in Maryland (College and Career Readiness and College Completion Act of 2013 {Chapter 533}). Maryland's practice is consistent with other States. The Education Commission of the States' comparison of finances supporting dual enrollment indicates that 35 states and the District of Columbia provide secondary and postsecondary providers of dual enrollment programming with the same level of funding as traditional (non-dually enrolled) students (Zinth, 2016).

Second, it is important to understand that in current practice in Maryland, community colleges are discounting tuition, our principal revenue source, by 25% to 50% for dual enrollment students. And, the public schools are paying a minimum of 10% of the cost of tuition and 100% of the tuition balance owed for Free and Reduced Meals (FARM) students. Several jurisdictions are paying 100% of the tuition balance for all dually enrolled students, but due to disparate financial capacities and, to some extent, due to local budget priorities, this practice is more the

exception rather than the rule. But, the point is that both sectors are making a financial commitment to support their dually enrolled students.

Third, Element 3f, item 4, stipulates that post-CCR pathway students will remain enrolled at least part-time in their high school for a range of services including academic, career and personal advising until their diplomas are awarded. These students will be able to continue to participate in school extracurricular activities. These services and activities all come at a cost and it makes perfect sense that the state supports this programming at both the secondary and postsecondary levels.

Finally, if the public schools were to lose significant funding for students who are prepared for a post-CCR pathway that includes postsecondary attendance, there will not be any incentive for them to encourage their students to pursue that route. Similarly, colleges need the funding support to offer the necessary courses and programming to support these students.

Recommendation:

Delete the language that suggests shifting the funding mechanisms for dually enrolled students in a post-CCR pathway that could result in either system being financially disadvantaged.

Compensating both sectors is appropriate. It is currently settled law in Maryland and 35 other States, plus the District of Columbia. It would be a serious disincentive to the schools and undermines the future success of the post-CCR pathway to change this funding stream.

College and Career (CCR) Pathways - Students not Completing the Standard

We want to draw attention to Element Detail 3g regarding 11th and 12th grade programs for students who do not complete the CCR standard by the end of the 10th grade. There is an undeveloped alternative that can offer an opportunity for these students to attend a community college in non-credit/continuing education workforce preparation coursework in order to obtain a skill or certification that can provide them with a technical credential, thereby helping them to also become workforce ready. Due to the many industry-recognized credentials and workforce training options that community colleges offer in support of their local workforce requirements, we believe that this is a very appropriate and viable option.

Recommendation:

Include, in the recommendation, a clearer, acceptable pathway to ensure opportunities remain available and viable for students who do not meet the CCR by the end of the 10th grade.

It should be stipulated that this pathway is also available free of charge to students and parents, with the recognition that, for the reasons outlined above, there is an expectation of continued funding for both the public school systems and community colleges.

CTE Subcabinet

The Commission recommendations lacked sufficient detail for us to make a determination of the scope, authority and function of the proposed CTE Subcabinet and the Skill Standards Board. This is a rather large and bold strategic recommendation that will potentially shift decision making and funding authority for Maryland's many stakeholders in CTE, workforce development, Workforce Innovation and Opportunity Act (WIOA) and apprenticeship training, at a minimum, for decades to come, affecting millions of Maryland learners. One of the strengths of Maryland's community colleges is our ability to respond quickly to local industry needs for customized training as their businesses evolve. We caution against creating a bureaucracy that could adversely affect that responsiveness.

We are pleased that the Commission has included community college representation on the establishment of a subcabinet. We recognize that the success of the recommendations will be contingent on furthering our work with local area high schools through middle college programs, dually enrolled students, P-TECH programs, Adult Education/ESL/GED and enhanced apprenticeships.

Recommendations:

Set clear goals and responsibilities for a subcabinet to avoid bureaucratic duplicity.

Explore other processes for increasing the emphasis on CTE within the current governance structure to include a sustained and financed marketing campaign.

Establishing a coordinating board that includes representatives from the existing entities that currently have the expertise needed to implement the recommendations.

Skills Standard Board

The identification of Maryland's critical workforce clusters and selection of training and certification standards is a function of the Maryland Governor's Workforce Development Board (GWDB). It is unclear what this proposed Skills Standards Board might add to this effort and what becomes of the GWDB. Moreover, there was a well-funded attempt by the federal government about 15-20 years ago to establish a National Skills Standards Board and to develop national skills standards across a broad array of industries. The effort fell apart after a few years, particularly in heterogeneous industries made up of many small employers and business owners, such as construction. We learned that one size does not fit all. It is critically important for local employers, local skill standards, and local industry practices to be the primary driving force behind program development.

Recommendation:

Allow existing bodies, such as DLLR, GWDB, WIOA, community college workforce advisory boards, and other locally, regionally and/or nationally recognized credentialing entities provide this expertise without the formation of another governing body.

College and Career Readiness

Community colleges are concerned about being required by law to enroll students in credit-bearing courses that are assessed as meeting the CCR standard based on National Center on Education and the Economy's (NCEE) study in the 10th grade. Community colleges would like the opportunity to participate in the development of any new instrument as a possible requirement for assessing the college and career readiness of students.

While we understand the need to determine whether students are eligible for post-CCR pathway programs, CCR standards should also be predictive of success in any postsecondary institution, not just open enrollment institutions.

Furthermore, research has shown that a single instance, high-stakes test underestimates individual capacity, especially in students of color, low income and first-generation students (Geiser, 2015). Alternative and multiple measures of verifying college readiness serve as more effective and preferable metrics than a single test (Scott-Clayton, 2012). All Maryland community colleges are currently using multiple measures to assess student readiness for college-level coursework. We believe that any CCR standard based on an empirical study should be one measure among many that is recognized by all postsecondary institutions.

Recommendation:

Ensure the inclusion of community college representatives in the development of any new instrument that will assess a student's college and career readiness and placement.

Recognize multiple measures for determining career and college readiness.

One Size Approach

Workforce needs vary significantly among geographical regions. While there are some labor market demographics that are present across regions, we cannot ignore the fact that significant sectors of the economy do not replicate across the state. The crab and oyster economy of the Eastern Shore does not translate to the ski resorts and camping economies of Deep Creek Lake. To this end, we must recognize that the spectrum of competency-based learning opportunities reflect, in part, the local missions of the community colleges. Within this context, the faculty of these programs serve as the creators and as the custodians of these curricula. While some

centralization could be necessary and productive, we must also allow for the local determination of curricula as an appropriate response to local economic and workforce needs.

Recommendation:

Respect local control in the design and development of the curricula to meet workforce needs.

Summary

We request that the Commission members thoughtfully consider the issues presented today with an understanding of the critical role community colleges play in the implementation of the Commission's recommendations. We emphasize that the successful implementation of these proposed regulations will require technical expertise that resides within Maryland's community colleges. Therefore, community colleges request participation in the design and implementation stages as these processes progress. We feel this collaborative effort will ensure a successful outcome.

Thank you for your kind consideration.



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