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**EDUCATORS
TOGETHER**

To: Commission on Innovation and Excellence in Education, Workgroup 3
From: Maryland State Education Association
RE: **Workgroup 3 Recommendations**

WORKGROUP 3

Narrowing achievement gaps and expanding opportunities for students are among the highest priorities for MSEA, but this workgroup report is fundamentally based on the development of a college and career ready standard that, on the one hand is laudable, but in the actual practice of development and execution may serve as the ultimate high-stakes test with disastrous impacts for high school students. We are skeptical of the benchmarks, undetermined standards, and the troubling possibility of large-scale grouping and tracking of students based on a single test score. We recommend a simplified report from workgroup 3 that focuses on expanded career technology education programs for every high school student and, when establishing a CCR standard, also creates a rigorous pathway for success. That standard should not be based on a yet-to-be-determined score on an unproven single test in high school (for most students in 10th grade). Additionally, any CCR standard setting must learn from flawed implementation of previous changes so as not to adopt a timeline that puts expected improvement in student outcomes ahead of the implementation of critical supports that will determine those successful outcomes. For example, if high quality early childhood education and interventions are necessary for expected improved student performance in high schools (we think they are), then a CCR implementation plan must be on a timeline that allows for those programs and services to be delivered. This may create a longer than desired implementation timeline, but it would be necessary in order to give the reforms of this commission the necessary time and space to be successful and implemented with fidelity.

Per your charge, we outline some specific concerns with this workgroup report below.

Element 3A

1. **The rhetorical goals of this element can be included in the overall workgroup charge, but the specific element and corresponding design assumptions should be deleted as they largely violate existing practice and state law.** Existing law empowers LEAs to develop curriculum; it should not be mandated by the state. Per the *Protect Our Schools Act of 2017* (Chapter 29, Sec. 7-203.4 E (3)), interventions for low-performing schools are to be locally determined. MSDE is not permitted to require county boards to implement a specific intervention strategy either directly or through statewide inspection teams. Even the identification of low-performing schools is done through a balanced matrix as approved by the federal government in our Every Students Succeeds Act plan; not by scores on statewide assessments.
2. **We caution against the possibility of assessment recommendations suggested in the design assumptions leading to a significant spike in new mandated state assessments.** The state has a cap on the amount of instructional time which can be used on mandated assessments (*More Learning, Less Testing Act of 2017*, Chapter 731). If all of the assessments noted in design assumption 3a-d are new, then this element would likely put all school districts above that cap. We have already suggested eliminating this element and assumptions, but we further recommend a recording and calculation of expected testing time of all proposed new assessments in the Commission's entire report.
3. **Providing educators access to the resources created by the Maryland District Curricular Support Materials Collaborative (MDCSMC) is beneficial.** Teachers across the state can utilize this resource to



inform the lessons they craft—either in collaboration with their professional learning communities or for their individual classrooms- based on the needs of their specific students. However, any curriculum mandates from the state are unacceptable. Educators should be empowered to use their professional judgement to determine what best serves the needs of their students. MSDE's role should be to provide access to the resources and supports they need to do their jobs.

Element 3B

1. **Reject this element until an actual test and standard can even be considered.** This is the element that most closely tracks with our overall concerns of this workgroup in the development of a high stakes test to determine (and limit) future pathways for students. The truth is, as a state, we don't know what the standard is yet. PARCC is changing to MCAP and that test and standard has not been validated yet. This element and corresponding assumptions acknowledge that these things need to be developed, but it leaves it to NCEE to advance an empirical study and set a global standard without any phase in. Whenever states change standards, we see a larger than previous group of students fail to meet the standard; so every time the standard is changed on students (as envisioned in 1d), we should expect to see a new gap in success. That could undermine our efforts to create clear standards and build public confidence in the work and outcomes of schools.

Element 3C

1. **MSEA supports tutoring interventions and recommends that this element require the use of best practices of tutoring support being provided by certificated teachers who know the students, staff, and school community in which they work.** The outsourcing of tutoring envisioned and allowed in HB 1415 (Chapter 361) was a flaw of that legislation which should not be compounded in this element or in the Commission's final recommendations. MSEA opposes any recommendation that envisions the hiring of non-certificated tutors.
2. **Expand the hiring and use of trained paraprofessionals as reading interventionists.** If the Commission is looking for a more affordable phase-in plan, then the tutoring should be done by trained paraprofessionals in the school.
3. **More specific information is needed around the role of the lead teacher and the tutor coordinator and the process for training school leaders and teachers.** In the current draft, there are no specifics describing what role the lead teacher will play and how (if at all) it will correspond to said teacher's classroom workload (i.e. will this be part of their regular teaching day or will serving as lead teacher be their only role?). There are also no specifics around who will serve as the program coordinator. This person should be a current school/district employee who knows the history, dynamics, and nuances of the system. Furthermore, while we agree that professional development will be necessary to ensure that educators are able to successfully implement this support program, this draft does not yet speak to how and when this professional development training will take place and who will be involved. Needless to say, MSEA believes that answers to these critical questions are important before members of the Commission make any final recommendation decisions.



Element 3D

1. **Providing additional supports to middle and early high school students who are struggling to meet CCR standards should not involve narrowing their access to well-rounded curriculum.** While we agree that students who are struggling to meet standards should be provided with the additional supports and resources they need in order to reach CCR, we are concerned that the interventions referenced in this section could resemble efforts seen under No Child Left Behind, in which struggling students were forced to double up on math and ELA classes at the expense of other courses such as social studies, arts and sciences. For our students to truly be CCR, they must not only be literate and numerate; they must also be well-rounded. For many struggling students, these subject areas are the topics in which they feel most engaged. In our effort to provide remediation, it is important that we do recognize the equal importance of these other subject areas.

Element 3E

1. **This element fundamentally changes high school. For numerous reasons, this needs to be considered with caution.** MSEA is a strong supporter of expanding access to CTE programs and the other post-CCR pathways envisioned here, believing that CTE programs should exist at every high school in the state and that all students should be provided an opportunity to participate. However, if not undertaken in a measured and thoughtful way, implementation of this element could increase tracking and add stress and anxiety for students as they have to decide as 9th and 10th graders which pathway they wish to take. The Commission should balance the exciting aspects of this element with a determination of the appropriate levels of decision making as we push CCR standards earlier and access to college earlier.
2. **The last sentence of this element should be clarified that elective courses and extra-curricular activities will remain available to all students.** The current language limits too many choices for students based on a CCR test and a specific pathway. The very electives or program choices available to high school students are necessary to keep many students engaged in school. Closing off those pathways could lead to tracking, increase discipline issues and even lead to more students dropping out.
3. **Protect high school teaching positions and remove the cost incentive to outsource high school credits to adjunct community college educators.** There are several assumptions and considerations about expanded dual enrollment that would include allowing higher education faculty to teach courses for high school credit. We suggest changing assumptions to require that any course taught at a high school be done by a certificated public school teacher who is an employee of the local board of education.

Element 3F

1. **This element essentially creates a system of early college high schools. Logistically, how will this ultimately impact our current high schools?** This element envisions providing students an opportunity to attend college while simultaneously attending high school, and continuing to have access to the programs, activities and services provided by their school. It does not, however, envision how this will work out logistically. How will students be transported to and from their classes and activities between campuses and who will provide this transportation? Given the misalignment between college course offerings and the current high school schedule, what adjustments will be required in terms of staffing, high school course offerings, and extracurricular activity scheduling? As was previously stated, we are concerned that this



recommendation poses a threat to high school teaching and staff positions as incentives are created to make the use of outside resources more attractive. In addition, this could also cause a negative effect on funding for districts and schools.

Element 3G

1. **We recommend caution and a delay in implementing this element until other facets of the CCR standard are established, tested, and validated.** Changing 11th and 12th grade for students who do not meet the CCR standard could entail significant impacts which may not have been considered by the workgroup or Commission. The potential for increased segregation as well as disparate racial/ethnic, gender, and socioeconomic disparities is daunting. If done incorrectly, this could become tracking at its worst. The labeling and sorting effects on students in 11th and 12th grade could be incredibly disruptive academically, psychologically and personally. A certification-attainment pathway which is closed off to these high school students because they did not meet the CCR standard in 10th grade will likely lead to more discipline-related issues. We should not forget that discipline is a growing issue at all levels. And at the high school level, feelings of disengagement, failure, or frustration for not keeping up with peers could create discipline problems that are even more intense. Finally, the proposal that 21-year-olds would be in high school until they reach the CCR standard not only poses potential developmental issues for them but also creates a difficult and potentially dangerous social environment as these adults would attend schools with 14-year-old children.
2. **Implementation Consideration 4 stands in direct violation of the Protect Our Schools Act of 2017.** Under the *Every Student Succeeds Act* (P.L. 114–95), the students described here would fall under either the Targeted Support and Improvement or the Comprehensive Support and Improvement category. As such, a provision requiring districts to adopt and/or utilize a state mandated curriculum would violate Sec. 7-203.4 E (3) of the Protect Our Schools Act.

Element 3H

1. **We are opposed to the creation of a Career and Technical Education Subcabinet as it is likely to result in the potential creation of a “25th school district”.** As it is currently described in Design Assumption 5, the newly created CTE Subcabinet plays a role that sounds eerily similar to that currently played by our twenty-four LEAs. Given its authority over budgets, regulations, instructor qualifications, credit awarding for course offerings, and logistics (to name a few), we believe that this subcabinet would be empowered to go far beyond serving in an advisory function and move dangerously close to becoming its own independent entity, empowered to conduct itself similarly to our local school districts. MSEA finds this to be unequivocally unacceptable.

Element 3J

1. **Career counselors are important, but they are not currently a priority.** Given the urgent need for counselors who are trained in providing social-emotional and mental health supports to our struggling students as well as the need for more school guidance counselors to assist our students with their academic concerns, we believe priority should be given to staffing these positions before increasing the



staffing of career counselor positions. Both types of counselors are important for our students' future outcomes. However, we strongly believe the previous are in more critical demand.

Element 3K

1. **Additional consideration and study is needed regarding the potential adverse outcomes resulting from the bifurcation of our current high school system.** This element calls for the creation of two types of high schools: Comprehensive CTE High Schools and Comprehensive High Schools. Comprehensive CTE high schools would “provide the theory portion of the technical training leading to credentials approved by the Skills Standards Board, plus the education needed to assure that the student leaves high school with the knowledge and skills needed to be a responsible citizen, learn quickly throughout his or her life and develop fully as a person. These schools will also be expected to provide access to AP, IB and Cambridge programs and other demanding academic programs, access to community college courses and the technical skill training required to fulfill their core mission.” Because there is not an equivalent descriptor for what a Comprehensive High School would do, we are left to assume that such schools will function as a “regular” high school currently does. On its face, this would seem to run contrary to the goal of providing all students with access to high-quality CTE programs and could facilitate the tracking of students. As was stated earlier, we believe all students should have access to CTE programs. What is described in this element creates a separate and unequal system which will not serve all students. Therefore, we would stand in opposition to such a move.
2. **In cases where school districts would need to collaborate in the creation of Comprehensive CTE High Schools, what impact would be had on labor- and logistic-related issues?** While we understand that much is still to be decided related to implementation logistics throughout the Commission’s recommendations, we are concerned about the potential impact collaborations such as this would have on issues such as local collective bargaining agreements; negotiated salaries and benefits; and transportation-related logistics. Further consideration must be given to these questions going forward.

Element 3M:

1. **MSEA supports adding CTE as a weight in the funding formula.** We know that providing comprehensive CTE programs for all students across the state will require a significant financial investment. However, we believe this is a sound investment for the future of our state and its people. We therefore support efforts to provide the funding necessary to make this endeavor successful.