

# Daniel D. Curry, Ed.D.

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To: Chairman Brit Kirwan  
From: Daniel D. Curry, Ed.D.  
Date: September 14, 2018  
Re: **Working Group 4 (More Resources for At-Risk Students)**

The Public School Superintendents' Association of Maryland sincerely appreciates the opportunity to comment on the Commission's workgroup recommendations. We thank the Commission for addressing the increased cost for meeting the needs of at-risk students. In particular, we need to emphasize our support for revising the funding formula weight for special education students, acknowledging that school systems are spending more than current funding provides for special education students. We want to point out that school systems are required to meet MOE for special education funding. We are wondering how this additional money will affect the MOE and/or if this money could be used to satisfy the MOE. The reality is that putting more money in general education benefits special education students because we want them to be integrated into those programs.

We have reviewed Working Group 4 (More Resources for At-Risk Students). Below are our observations and comments:

- Element Detail 4a, Design Assumptions #3: "Each school would have to submit an implementation plan based on an assessment of need." - **We think that predetermined factors should determine funding need rather than the submission of an implementation plan. Would the additional funding be dependent on the submission and acceptance of an implementation plan? Would the funding vary based on the strength of the implementation plan? Who would be receiving and reviewing the plans? We assume it would be MSDE? It would appear that this new funding might be conditional rather than discretionary funding (which the Thornton formula funding provided).**
- Element Detail 4a, Design Assumptions #4: "This fixed funding would be used to hire a community schools coordinator and a health services practitioner" – **Would these have to be new positions or could we delegate these responsibilities to existing staff?**
- Element Detail 4a, Design Assumptions #4f: "This per pupil funding could be used to provide programs and services. This would include family and community engagement and supports including informing parents of academic course offerings, opportunities for children and social services." - **We need clarification as to what it means by "opportunities for children and social services." Should it read "opportunities for children to access social services?"**
- Implementation Considerations #1a): "A community based needs assessment process that is conducted in partnership with a local capacity building organization." – **What is meant by a local capacity building organization?**

- Implementation Considerations #1b): “Ensuring that an experienced and qualified community schools coordinator at a vice principal level is hired.” – **We are concerned about the state removing local control by determining at what level we must hire a position.**
- Implementation Considerations #1c): “Inclusion of community partners in geographic proximity to the school who can assist in meeting the needs identified.” – **Because of the rural nature of some of our school systems, we have a lot of schools with little to no proximity to a community partner (the closest for some of our schools would be many miles away). While we think it is a good idea, it should be encouraged but not required.**
- Implementation Considerations #3: “Local governments would be expected to demonstrate support through meaningful partnership and support that is supplemental and does not supplant existing efforts.” – **This appears to be a state mandate for additional local funding support – local governments are already concerned about current MOE requirements.**
- Implementation Considerations #5: Accountability should focus on indicators that include, but are not limited to: successful implementation of the plan,” – **“Successful Implementation” is in the eye of the beholder. It screams of diminishing local control.**
- Implementation Considerations #6: “Every year districts will be required to report on their program including progress on indicators.” **Additional reporting requirements will increase administrative workload on already over-taxed administrative systems. We see this as another unfunded mandate.**
- Implementation Considerations #6: “The full commission should include this element in their discussions of accountability and governance including whether there should be consequences and what those consequences should be, if progress is not being made” – **Consequences always smell of “we are going to withhold your money.” Barring willful neglect or incompetence, none of us are going to set out to spend the additional funding frivolously. We are all about trying to help the children – why should we be penalized with consequences when we believe we are using the funding effectively for our communities? Once again, success is in the eye of the beholder.**
- Outstanding Issues #2 “What proxy should be used for identifying FRPM students going forward?” – **We recommend that we use the mechanism used by the community eligibility program to identify eligible students – why reinvent the wheel?**
- Outstanding Issues #3 “To whom should the implementation plans be submitted?” **Why would there be any thought to submit to anyone other than MSDE?**
- Element Detail 4b: “Train school staff in all schools to recognize mental health issues” – **Our thinking is this sounds like an attempt to take teachers and turn them into mental health professionals. This would create more burden on already over-worked teachers.**
- Element Detail 4c Design Assumptions #8: “A weight is recommended as the “stop-gap” weight” - **How was the 2.18 weight developed?**
- Element Detail 4c Design Assumptions #9: “The result of this stop gap weight is that State funding, in fiscal 2015 dollars, increases by 195% from \$272 million to \$800 million.” – **Seems unrealistic – how is the state going to find funding for this huge increase in Special Ed alone? Will this affect the LEA’s requirement for MOE in special education? Again we state that investing more into general education also benefits special education students since the goal is to integrate them into these programs.**
- Element Detail 4d Design Assumptions #3: “In addition to what APA recommended, the EL weight should be increased to provide a family liaison.” – **Our school systems already provide family/home school liaisons for the schools. Could we use the funds to supplement these positions, or would they have to be additional positions?**

