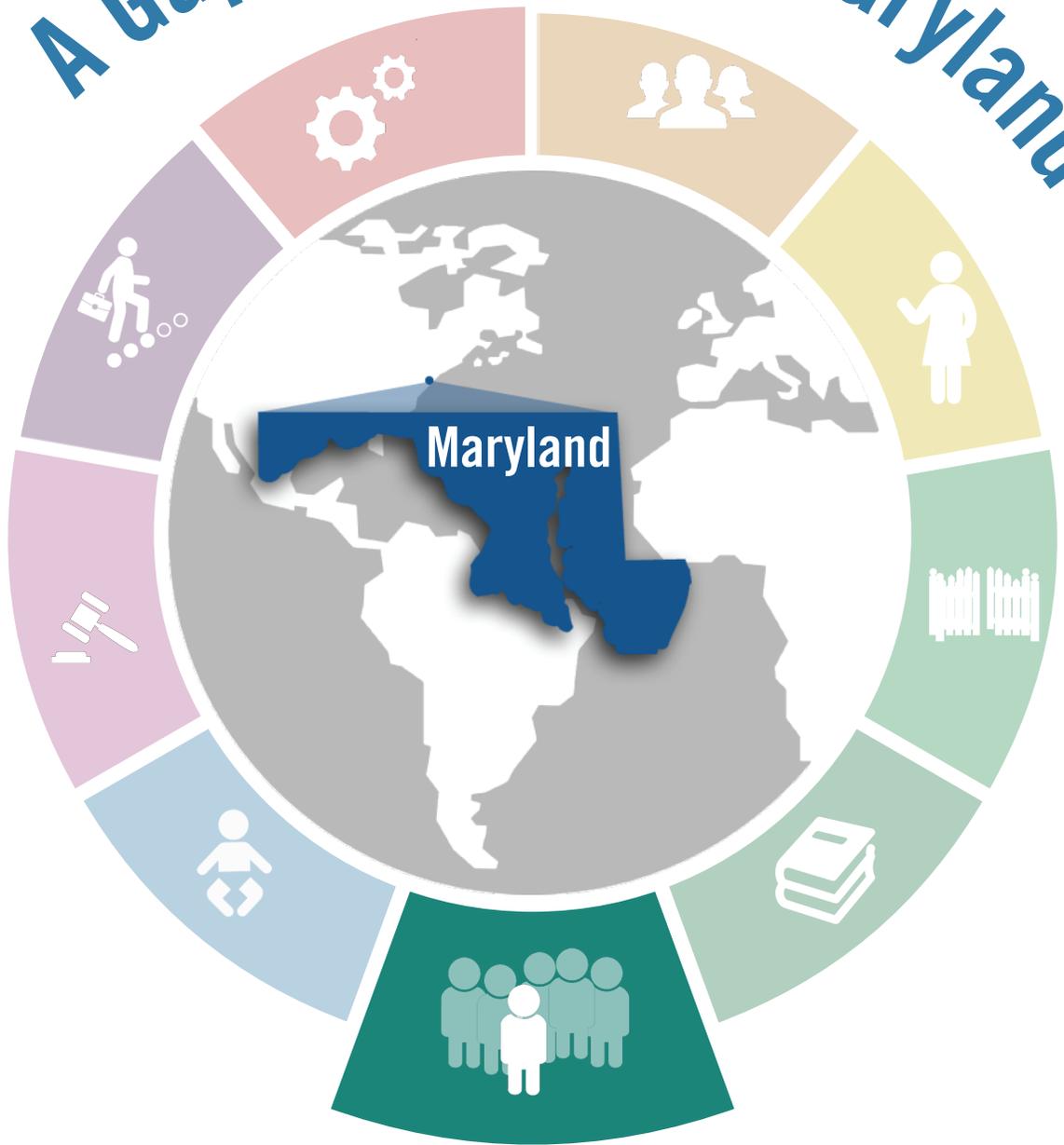


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A Gap Analysis for Maryland



Building Block 2 PROVIDE MORE RESOURCES FOR AT-RISK STUDENTS

Overview of Maryland School Funding

Maryland was one of the first states to reform its education finance system to ensure that students received adequate funds to achieve the state education standards. In 1999, a commission, known as the Thornton Commission, was convened by the state legislature to recommend changes to the state's funding formula so that all students would have the opportunity to meet state education standards. Cost studies were commissioned to determine a basic level of funding for all students annually plus additional funds for specific populations of at-risk students. There were two types of cost studies commissioned: a professional judgement and a successful schools approach. The professional judgment approach uses panels of educators to determine the kind of resources needed to achieve a set of objectives in a prototypical school. The successful schools approach looks at the spending patterns of schools that meet those objectives.

The Commission ultimately chose to recommend the foundation grant amount (\$5969) recommended by the successful schools study, as it was based on actual spending, had a methodology that linked spending to achievement of state standards, and it had been upheld by the courts in at least one other state as a sound basis for calculating adequate education funding. To determine the amount of additional funds the state and counties would contribute for at-risk students, the Commission had to identify “weights” by category of at-risk student that would apply as an additional amount to the base funding. The Commission chose to recommend the weights suggested by the professional judgement study conducted by a third

party, as the successful school study did not propose weights. The following weights were recommended before adjustments were made:

- 1.39 for low-income students
- 1.17 for special education students
- 1.00 for English language learners

To determine the state share for the foundation grant, the state funds for the at risk groups, and the minimum local share of the foundation grant, the Commission recommended the existing formula using assessed property values and taxable income of county residents. The Commission also recommended that the state should guarantee, at minimum, in any given year that it would contribute 15 percent of the per student amount of the foundation grant to each county, regardless of county wealth. The foundation grant would also be adjusted based on a geographic cost index, which would be devised to account for the differences in the cost of educational expenses across the state. The Commission also recommended a formula for adjusting the base amount to account for inflation starting in 2005. The formula that was recommended was significantly higher (\$1.1 billion) than what Maryland was spending at the time.

The *Bridge to Excellence in Public Schools Act of 2002* codified most of the Thornton recommendations in state law. The Act put in place the recommended foundation grant amount and weights, both adjusted to account for overlaps of populations in more than one category and to remove the portion of federal and other funds included in them. This adjustment was recommended by the Commission. The foundation grant amount put in place in the 2002 law was

\$5443 (excluding retirement) and the weights were:

- .97 for low income students
- .99 for ELL students
- .74 for special education students

The Act put in place the Thornton recommendations for determining the local share of the foundation grant and the additional funding for at-risk students for each county. However, the Act also added a requirement that the state pay at least 40 percent of the at-risk amounts for each school system, regardless of the wealth of the county. While the counties were required to pay their share of the foundation grants, the law did not *require* them to pay the local share amount for at-risk students determined by the weighted formulas (nor did the Thornton Commission recommendations).

Local school systems were given broad flexibility to determine how best to use the state aid to meet the needs of their students but were required to develop a master plan for using the funds to increase student achievement with accountability measures focused on outcomes. The new system was phased in over five years (FY 2004 to 2008). Since FY 2008, the formulas were to take into account changes in school enrollment and inflation annually.

However, there have been a number of reasons why schools have not been fully-funded under the formulas put into law in 2002. First, the foundation formula's inflation factor was frozen in FY 2009 through 2012 due to state budget shortfalls and capped at 1 percent from FY 2013 through 2015. And second, during the great recession, several counties received waivers from the maintenance of effort requirement, which allowed them to rebase their local contribution to a lower amount. In 2012, legislation clarified the conditions under

which counties may be eligible for a maintenance of effort waiver and also shifted the penalty for not complying with the "local maintenance of effort" requirement from the school system to the county.

The *Bridge to Excellence in Public Schools Act of 2002* required a follow-up adequacy study to be done 10 years after the new funding systems were implemented. This study was delayed several years and completed by APA Consulting in December of 2016. The study authors recommended **raising the base funding** amount from \$6860 to \$10,880 (in FY 2015 dollars) and **changing the weights** to:

- .35 for low-income students
- .35 for ELL students
- .91 for special education

They also added a new "category" of weights for pre-kindergarten to be set at .26 weighting.

The rationale for this new formula, according to the APA study authors, was that the costs for education had risen since 2002, and more demands were placed on schools. They point to the implementation of the Common Core State Standards and the state's new College and Career Ready state standards and argued that the schools have to help students reach an even higher standard. To get all students there, not just at risk students, they argued for an increase in system-wide funding rather than funding just targeted at those at risk. In particular, they argued that the new standards and accountability requirements would mean that schools had to spend more on all students to:

- Decrease class size
- Increase instructional staff, including instructional coaches

- Increase planning time for teachers
- Hire more school counselors, nurses and behavioral specialists for all students
- Create technology-rich learning environments
- Provide pre-K for all 4 year olds
- Establish more district-level school personnel to support schools

In addition, they argued that the higher overall levels and concentrations of poverty in the state argue for more base funding across the counties rather than targeted funds on specific students.

APA also made some other key recommendations:

- 1) They recommended **changing the formula for calculating the local share** of school funding to weight taxable income more than property wealth.
- 2) They recommended **eliminating a minimum level of state aid** for both the foundation grant and the at-risk funding for all counties, arguing that counties that can afford to pay the full amount should and the state funds should be reserved for supplementing the poorer districts.
- 3) They recommend **requiring counties to pay their full share** of aid for at-risk students.

If all of the APA recommendations were put in place, the schools would receive an additional \$2.9 billion, including \$1.9 billion in state aid and \$1 billion in local funding.

With this historical overview, a description of how Maryland currently funds its schools, and a summary of the

recommendations made by the consultants hired to review funding adequacy for the state, we turn to an analysis of how Maryland compares to top performing US states and top performing international jurisdictions in providing equitable and adequate financial and human resources to students most at-risk.

How does Maryland compare?

Equitable and adequate financial resources for at-risk students:

Per-pupil spending in Maryland is the 10th highest among states, but drops to 16th highest when adjusted for regional cost differences. While Maryland spends more than many states on education, we would expect it to be a higher spender given its wealth, as Maryland's median income level is the highest in the nation. New Jersey and Massachusetts both spend more — they are ranked 3th and 7th — and New Hampshire is ranked about the same as Maryland at 9th highest, although once regional differences are taken into account it is also ranked higher than Maryland at 7th highest.

Maryland's per-pupil foundation grant of \$6,964 (FY17) is lower than the foundation grants in either Massachusetts or New Jersey. The grant in Massachusetts is \$6,927-\$8,637 (FY2017), depending on the level of school, and it is \$11,195 (FY2017) in New Jersey. It is almost double that of New Hampshire at \$3,561, but New Hampshire is a special case, with the highest percentage in the country of education funding from local sources rather than the state.

Maryland adds weights to its foundation grant for three populations of at-risk students: English language learners (ELL), low-income students and special education students. Maryland's

ELL and low-income weights are among the highest in the country, while the special education weight is among the lowest.

- The ELL weight (.99) is much higher than the benchmark states, and the highest nationally. Massachusetts' weight is .07-.33, depending on grade level, New Jersey's is .5 and New Hampshire's is .19.
- The low-income weight (.97) is higher than the benchmark states and among the highest in the country. Massachusetts is .26-.33, depending on grade level. New Jersey and New Hampshire have ranges that vary depending on concentration of poverty. New Jersey's range is .33 to .47 and New Hampshire's range is .12 to .48. Maine's weight of 1.2 is the highest weight among the 31 states that apply a weight for low-income students; Maryland's weight is among the highest.
- The special education weight (.74) in Maryland is lower than the weights in Massachusetts (1.27) and New Jersey (.17 to 1.33), but higher than New Hampshire (.52). Among the 20 states (and D.C.) that add weights for special education, Maryland is among the lower ones. States vary in how they do this, with nine applying a single weight like Maryland does but with most states applying different weights depending on the disability. Among the eight other states using a single weight, five apply a higher weight than Maryland. Most of the states using multiple weights do as well.

- Notably, New Hampshire adds a weight of .19 for third graders who are not reading on grade level.

Maryland does not do well on measures of funding equity. The state spends 4.9 percent **less** money on poor school districts than on wealthy ones, when looking at the overall amount of state and local spending per-pupil. That is lower than all of the benchmark states and the 16th most regressive among all states. When federal funding is added in, Maryland spends 1.5 percent **more** on poor school districts than wealthy ones, which is the 9th most regressive among states.

Maryland's inequity in funding between poor and wealthy school districts is occurring even with a funding formula with relatively high weights for at-risk students. Possible explanations for the inequality of funding are:

- Not all counties fully fund the local share of the at-risk weights, as they are not required to by state law;
- The formula Maryland uses to calculate the local share of the foundation grant and the at-risk funding favors property wealth over income level of the county populations, which does not fully capture the economic disadvantage in some counties.

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Chart 1: Funding for At-Risk Students in the Top Performing States and Maryland

	MA	NH	NJ	MD
State Median Income (BLS, 2015)	\$67,846	\$70,303	\$72,222	\$75,847
Ranking among all states of total per pupil revenue (NCES, 2014) ²	7	9	3	10
Per pupil spending and rank among all states (2013), adjusted for regional costs difference ³ (KidsCount, 2016)	\$13,546 (13)	\$14,718 (7)	\$15,742 (5)	\$12,679 (16)
Percent revenue from federal, state and local funds (NCES, 2016) ⁴	5.4 federal 39.2 state 55.4 local	5.5 federal 60.4 state 34.1 local	4.3 federal 40.6 state 55.1 local	5.9 federal 44.1 state 50.0 local
Base state grant (FY17)	\$6927-\$8637, depending on level of school ⁵	\$3,561	\$11,195	\$6964
Percent additional for ELLs	7-33, depending on grade level	19	50	99
Percent additional for special education students	127	52	17-133, depending on level of need	74
Percent additional for low-income students	26-33, depending on grade level (lower grades are higher)	12-48, depending on concentration of poverty	36-47, depending on concentration of poverty	97 (state guarantees 40)
Percent additional for below proficient readers		19 for 3rd graders reading below proficient, who do not receive additional funding through other allocations		
Percent additional state and local funds spent on students in the poorest quartile of schools than on students in the wealthiest quartile of schools (NCES, 2016) ⁶	7.3 rank 6	1.4 rank 22	7.3 rank 4	-4.9 rank 34

	MA	NH	NJ	MD
Percent additional state, local and federal funds spent on students in the poorest quartile of schools than on students in the wealthiest quartile of schools. (NCES, 2016)	14.8 rank 6	8.1 rank 22	16.1 rank 4	1.5 rank 41

Overall, the top international performers fund their education systems more equitably than any U.S. state, including Maryland. None of these jurisdictions rely primarily on property wealth of local areas to determine funding levels.

- Singapore is the most straightforward with the national ministry distributing equal funds to all schools on a per-student basis. They do not add student weights, except for special needs students. Instead they assign additional teachers and enrichment funding to all schools to flexibly address the needs of students who need extra help. Singapore’s mixed-income housing policies result in local schools with mixed-income students and no concentrations of poverty in specific schools.
- Ontario collects local school taxes at the provincial level and then distributes funds equitably throughout the province with a formula that assigns more money for students who are more expensive to educate, including low-income students, students with single parents and students at-risk of not graduating from high school, as measured by not passing the 10th grade literacy exam.
- Finland uses a combination of funds from the national level and the local level to fund schools but redistributes local funds to ensure that all localities receive about the same amount. They add weighted funding for children whose parents have low education levels, used as a proxy for a wide range of disadvantages. Like Singapore, they assign support teachers to every school to provide extra support to any student needing help in literacy or mathematics. Almost one-third of all students are supported at some point in their school career.
- Shanghai receives funds from the National Education Ministry for per-pupil expenses, but also sends funds back to the National Ministry to redistribute to less wealthy provinces across China. The province distributes per-pupil funding to supplement and equalize the funding that local districts raise themselves through taxes. They do not weight their formulas at this point except for a small special needs population of students. Instead, low-income students receive direct financial supports to cover food, transportation, fees and, at the secondary level, living stipends and tuition.

It is worth noting that special education, a large and growing cost for states in the US, is generally structured differently in many of the top-performing countries. The top performers tend to categorize a much lower percentage of students as “special needs”, and mainstream all but those with the most significant physical and cognitive disabilities. For example, only 5 percent of students in Singapore are in special education. The exception is Finland where almost one-third of students received “special supports”, but this is primarily done as extra help to small groups of students that occurs regularly through a student’s career and, because almost all students receive this support at some point, there is no real stigma attached. The growing percent of students labelled special education in the U.S. has been an issue for many states, and there is some evidence that there is an over-representation of low-income and minority children labelled special education. Top performing international systems with an abundant supply of high quality teachers and a collaborative work organization that gives more time for teachers to work together and with students that need help keeps special education funding low and productivity high.

Access to high-quality teachers and extra academic support for at-risk students:

Maryland, like all other U.S. states, does not have specific policies to assign high-quality or additional teachers to high-need students or schools. The state does fund additional staff to support high-need populations through some specific federal funding (Title I funds for high-poverty schools) and some state programs like the Public Schools

Opportunities Enhancement Program, which funds projects to extend the school day and school year in high-poverty schools. Maryland’s 21st Century Learning Center programs also provide funding for afterschool educational support and enrichment activities for low-income schools, however, funding for these Centers may end if the Congress does not refund the program as suggested in the federal government’s proposed budget.

Maryland, like other states, has been required by the federal government to monitor its educator equity data since 2009. This data looks at whether at-risk students, including low-income students and minority students, have access to highly qualified teachers at the same rate at which other students in the state do. The federal government required states to compare the percent of students in the lowest-poverty quartile of schools (LPQ) and highest-poverty quartile of schools (HPQ) who had teachers who were inexperienced, rated less than effective on the state teacher evaluation system, were teaching out of their certified subject areas, were absent more than 10 days, and salary levels. Maryland’s data from the 2015 state report and the updated data in their ESSA plan show clear patterns of inequity across the state. This is the case in the top performing states as well, although Maryland 2015 Equity Report showed bigger gaps in all areas except for teacher absenteeism than in the benchmark states. This was particularly true for the salary differential. Maryland’s 2017 data in its ESSA plan, which focused on poor children in Title 1 schools rather than high and low poverty quartiles of school districts, in general showed slightly smaller gaps in access than seen in the benchmark states.

Chart 2: States' 2015 Equity Profiles⁸

	Percent of teachers in their first year of teaching		Percent of teachers without certification or licensure		Percent of classes taught by teachers who are not highly qualified		Percent of teachers absent more than 10 days		Adjusted average teacher salary	
	HPQ	LPQ	HPQ	LPQ	HPQ	LPQ	HPQ	LPQ	HPQ	LPQ
MA	7.8	4.4	3.3	3.7	4.5	.9	24.8	24.4	\$68,825	\$66,848
NH	4.2	2.8	2	0.5	1.6	2.1	34.5	26.9	\$49,479	\$48,998
NJ	5.8	5.2	0.8	0.9	0.3	0	30.3	18	\$63,343	\$65,710
MD	7.3	3.1	5.1	1.9	14.2	4.2	29.1	28.8	\$54,480	\$61,208

HPQ: High poverty quartile; LPQ: low poverty quartile

Chart 3: States' 2017 Equity Updates

	Gap between low-income students in Title I schools and non-low income students in non-Title I schools ⁹		
	Percent taught by out-of-field teachers	Percent taught by ineffective teachers	Percent taught by inexperienced teachers
MA	8.8	4.3	5.3
NH	NA	NA	NA
NJ	8.5	8.4	0.24
MD	3.8	4.3	3.9

Maryland's 2015 Equity Plan identified a number of issues to account for the disproportionate numbers of challenged students assigned the least qualified teachers. Among the issues identified were: 1) a lack of control over the quality of the significant portion of their teaching force that is trained out-of-state (60 percent); 2) a high attrition rate among new teachers (10.8 percent within the first 5 years); 3) teaching shortages in certain subjects as key issues; and 4) shortages of highly qualified teachers in rural areas of the state. The plan to address these issues, updated in 2017 for ESSA, proposes to continue work to provide more and better access to highly qualified teachers across the state through the development of regional Teacher Learning Centers to support teacher preparation and professional development. These Centers will be

hubs to serve a variety of roles such as: provision of professional development, coordination of internships for teacher candidates regionally, sites to deliver alternative teacher preparation for the region designed to meet the needs of districts with shortages of teachers in particular subjects; and technology centers to offer long distance learning opportunities to teachers in rural areas of the state. In addition, the plan identified six school districts where inequities in educator access are highest and proposes the development of specific interventions there. Among the proposed strategies include: changing the Quality Teacher Incentive Act to expand incentives for teachers in these schools to get National Board for Professional Teaching Standards certifications and a range of incentives to attract high quality teachers to schools with high-need populations

such as housing incentives, job search assistance for spouses and loan forgiveness. The state is also considering a range of other strategies, including: more professional development (with stipends) targeted at teachers with less experience; adding requirements to teacher preparation programs to give students experience with diverse and high-need student populations; allowing principals in low-performing schools first choice of new teacher applicants. In addition, the state is committed to collecting data on this issue annually and including information about educator equity in its annual state reports on education, including its statewide staffing report.

Maryland's strategies for addressing inequities build on similar strategies to those in the benchmark states, and the approach of working through new regional Teacher Learning Centers seems promising. Massachusetts is a state to look to for ideas about addressing these issues, as they have moved further along in implementation of the various parts of this agenda. In particular, their Elevate Preparation: Impact Children (EPIC) portfolio of initiatives to improve educator preparation has useful strategies, including funding a set of grants to districts to partner with the state in developing strategies to train more teachers in shortage subjects and improving teacher induction in high-poverty districts to reduce the attrition rate in those districts. In addition, Massachusetts has expanded its data collection on education equity to include access to high-quality school leaders as well as teachers and is also collecting data on English-language-learner populations, as well as the federally-required populations of at-risk students and minority populations. Maryland might consider doing this as well.

All of the international top performers assign extra teachers to work with high-need students. Finland and Singapore assign all schools learning support teachers who work with small groups of students in classrooms to provide them with extra help to stay on-track in class. Ontario assigns literacy and numeracy support teachers to all schools, and additional teachers to secondary schools where there are high numbers of students at-risk of not graduating. These extra teachers work with students under the direction of the classroom teacher, with the aim of helping these students succeed in the specific work for that class. This is different than what is typically done in the US where students are often pulled out of class to work with specialists once or twice a week, and most often using an "intervention" program that is not necessarily aligned with the classroom curriculum. Afterschool support is most often provided by paraprofessionals, again with little coordination with classroom work.

In addition to assigning more teachers to at-risk students, many of the top performers have explicit policies to ensure that these students are taught by the most qualified and/or highest-quality teachers. For example, both Singapore and Shanghai assign well-regarded teachers and school leaders to help low performing schools and teachers. It is an expectation that many educators on higher levels of Shanghai's career ladder will teach for a time in lower performing or rural schools, either as part of the Empowered Management Schools process that shares school staff collaboratively across high and low performing schools, or as part of a temporary rotation into a low performing school full time. It is very hard, if not impossible, for teachers to move up the career ladder in Singapore

and Shanghai unless they have taught disadvantaged students. While Finland does not have a specific policy to assign high-quality teachers to high-need schools, there are financial incentives for teachers to work in rural and high-need schools. In addition, many teachers teach in rural areas initially, as jobs in the cities are more competitive. In effect, this helps to distribute high-quality teachers throughout the country. In addition to these specific policies, all of the top-performing jurisdictions have much higher entry standards for the profession, which ensures a higher quality bar for teachers across the system.

Recommendations

Resources required to fund a Maryland education system that would be competitive in both student performance and equity with the best education systems in the world

There are two core issues here: First, how much money would be required to enable Maryland's students to achieve academic standards as high as the students in the countries with the world's most effective education systems, and, second, how should that money be distributed to schools and districts to provide as much equity as possible, or, put another way, to reduce the gap between the performance of the bottom quartile of students and the top quartile as much as the top performing countries have.

Maryland already spends more than almost all the top performing countries per student on its elementary and secondary schools. But this comparison does not take into account the fact that income inequality in the United States is the highest in the industrialized world and the concentration of poverty is higher in the United States than in much

of the industrialized world. These facts force the schools to use significant amounts of their funds to provide a wide range of services to low-income students that are either provided by other agencies of government or are not needed in the countries with the top performing education system. Because the available data does not make it possible to compare national or state budgets in these categories, it is impossible to say how, when the costs to the schools of inequality and concentrated poverty are taken into account, Maryland's costs of education compare to those in the top performing countries, but the evidence we do have suggests that the costs when compared in that way would not be very different.

However, the evidence from the OECD data shows that, once a nation reaches a level of spending of \$50,000 per student over the period of that student's compulsory education, how the money is spent is more important than the amount that is spent in determining student achievement. Maryland is far beyond that point.

The study done for Maryland by APA hinges on the idea of adequacy and on research methods that APA used to determine how much money would be required to provide an education for Maryland students that would be adequate for reaching Maryland's goals. It drew on a number of methods for making these judgments. The first, used to determine how much money would be needed for the base, was determined by researching the actual costs in a panel of schools that were successful. The second, used to determine the weights to provide additional funds to certain categories of vulnerable students, was determined by education experts. APA then suggested that these figures be corrected for certain factors,

such differences in the cost of living between urban and rural areas.

These methods are widely used and have repeatedly stood up to court challenges. Similar methods were used to provide the rationale for the recommendations made by the Thornton Commission. The legislature used those recommendations as the basis for the legislation that currently determines school funding in Maryland, making adjustments to account for, among other things, the fact that individual students might reasonably be counted for more than one of the conditions for which weights were recommended.

While the legislature accepted the broad approach recommended by the Thornton Commission, the legislation it enacted departed from those recommendations in important ways and was further altered by subsequent legislatures. NCEE recommends that the Commission consider the following options:

1. Increase the special education weight, which is significantly lower than the weight assigned to special education students by other states with pupil weighted school finance systems
2. Add additional funds for school districts with concentrated poverty; this could be done by altering the formula for this purpose or, like many top-performing countries, by allocating additional teachers to schools serving low-income students with an increasing ratio for schools in areas of concentrated poverty
3. Change the way local wealth is calculated for the purpose of determining the local contribution by rewarding districts for making a

larger than average tax effort with more state aid. This is now done with the guaranteed tax base system, but the level of aid provided in this way should be raised to create a fairer system

4. Require local systems to fund their fair share of the at-risk pool
5. Eliminate the feature of the formula that adjusts the state contribution on the basis of cost of living. This feature makes it more difficult for rural school districts to attract teachers for the same reasons that it makes it harder for rural communities to attract doctors to rural areas
6. Focus special education funding on students who have specific cognitive or physical impairments, staying within the requirements of IDEA. There is a good deal of evidence that students who do not have such impairments but are labeled as special education students are more harmed by the label than helped by the additional resources

At a subsequent meeting, there will be a full discussion with the Commission of the recommendations and financial implications to enable at-risk students to achieve high standards that the Commission has already discussed. Among items on that agenda will be:

1. Expanding and intensifying early childhood education and care
2. Providing more high quality teachers to high needs schools
3. Providing incentives to teachers to teach in high-need and rural schools including pay bonuses and advancement on a career ladder for successful service

4. Providing tuition grants to top-achieving students who commit to teaching in high-need or rural schools
5. Creating a system for teachers and school leaders from successful schools to work in partnership with high need schools
6. Allocating additional teachers and other resources to schools using the results from an early warning system that identifies students that are not on track. While Maryland has various policies in place to offer support to students, the state should rethink its policies for struggling students to ensure that the support is explicitly linked to classroom

instruction, is provided as soon as students need it and is delivered by high quality teachers

7. Reorganize work organization in schools to allow for more time for teachers to work with struggling students
8. Support community schools that that provide services and programs for at-risk students and families

Also at a subsequent meeting, the Commission will have to decide what recommendations to make on the base funding and what the state should do about the reform agenda they recommend.

<https://www.doe.k12.de.us/cms/lib/DE01922744/Centricity/Domain/366/Hanover%20-%20State%20Funding%20Models%20for%20Special%20Student%20Populations.pdf>

<https://nces.ed.gov/pubs2016/2016301.pdf>;
https://nces.ed.gov/programs/digest/d15/tables/dt15_235.20.asp

<http://datacenter.kidscount.org/data/tables/5199-per-pupil-educational-expenditures-adjusted-for-regional-cost-di#detailed/2/2-52/false/36,868,867,133,38/any/11678>

https://nces.ed.gov/programs/digest/d16/tables/dt16_235.20.asp

\$7307 for elementary school students; \$6927 for middle school students; \$8637 for high school students

https://nces.ed.gov/edfin/Fy11_12_tables.asp

https://nces.ed.gov/edfin/Fy11_12_tables.asp

<https://www2.ed.gov/programs/titleiparta/resources.html>

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