Commission on Innovation and Excellence in Education,
William E. Kirwan, Chair
c/o Department of Legislative Services by electronic mail
<PreK-12InnovationandExcellenceCommission@mlis.state.md.us>

The Maryland Education Coalition (MEC) is made up of individuals and statewide organizations who represent students, parents, and special population groups. We advocate for adequate, equitable funding and systematic accountability for the nearly 900,000 students in Maryland’s public schools regardless of their academic, cultural, economic, geographic, racial, or other demographic status.

For over three decades we have been active in the education and government arenas at the local, state and national level, working with policy makers, education experts, administrators, boards, parents, students, and advocates. Our members observe and serve on many state-wide commissions, task forces, and advisory groups.

Although we advocate for all public-school communities, many of us focus on communities with high concentrations of poverty, minorities, disabilities, limited-English proficiency, and Gifted & Talented student groups who are less likely to have adequate, equitable access to educational and other student services needed to become college or career ready.

Below are MEC’s recommendations and comments on the details of the various workgroup reports presented to the Commission. A number of our group members have submitted detailed comments on Work Group 4 so we have not repeated those comments here.

Working Group 1 Early Childhood Education

Element Detail 1a – Expand full-day Pre-K
MEC strongly believes that the current proposed 10-year timeline to fully implement full-day Pre-K for 4-year-olds & high poverty 3-year-olds is much too long, especially for students who are within 185% of the federal poverty level. This especially applies to those low-wealth school systems who have been historically under-funded with high percentages of At-Risk and Minority students. (see attachment 1).

We urge phasing in full-day Pre-K for 4-year-olds below 185% of the federal poverty level (FPL) first, followed by those between 185% and 300%. We support full-day 3-year-old programs for children up to the 300% FPL, phasing in students below 185% FPL in the first three years.

Pre-kindergarten programs should be funded as a per pupil in the education formula as are K-12 students, with a foundation amount and any applicable weights (special education, ELL, Compensatory Education, Concentrated Poverty) and subject to the local/state share.
Working Group 2 - High Quality Teachers and Leaders

Element 2a
MEC supports greater diversity in the classroom not just by race, but by gender, so more students have teachers who have had experiences like them, promoting better understanding. **Maryland needs more teachers of color and more male teachers of color.** We also urge MHEC and MSDE to work collaboratively to develop a consensus that ensures that higher education and local education departments include course work and requirements to meet the need for quality Pre-K to 12th grade education including:

- Content mastery of subjects/courses taught
- Classroom management and child development
- Foundations of Curriculum and Instruction¹,
- Cultural competency, social, emotional, and health/mental health
- Foundational understanding at minimum of all Special Population Groups (*Special Needs, ELL, Gifted & Talented, Poor, Homeless, Foster Care, children of color, and other at-risk students, etc.*)

Element Detail 2b – Raise standards for licensing new teachers in MD
MEC supports requiring certain teacher candidates to pass a written test of foundational reading skills similar to the test required in Massachusetts and 16 other states. Teachers required to pass this test for certification include: Pre-K to 6th grade general educators, special education teachers, reading specialists and English Language Learners.

Work Group 3 - College and Career Readiness Pathways

Element Detail 3a – Develop a fully aligned instructional system
MEC supports a tiered instructional system that includes differentiated instruction in the general education classroom (Tier 1), as well as a tiered intervention framework (tiers 2, 3) for students who need additional instruction. The differentiated groupings must be flexible and meet the needs of all academic ability groups including special education, ELL, struggling learners, and students who may be high-achieving, high-ability or Gifted & Talented, and twice exceptional students. Tiered instructional groupings should follow best practices denoted by NCEE, IES, and the National Center on Improving Literacy.

MEC believes that aligned instructional systems should include standards, or curricular frameworks with embedded standards as stipulated in COMAR for core subjects.²

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¹ **Foundations of Curriculum and Instruction**, Defined
² In Maryland, **What are Core Academic Subjects?**

- A Core Academic Subject is one where students receive core content credit:
  - Fine Arts: dance, media arts, music, theatre and visual arts
  - Reading or language arts
  - English
  - Science
  - Mathematics
  - Social studies: civics and government, history, geography, economics
Element Detail: 3c Element (jointly considered with Working Group 4): Tutoring for all K–3rd grade students
The Maryland Education Coalition (MEC) supports each of the concerns and recommendations provided by the Education Advocacy Coalition for Students with Disabilities (EAC) to the Kirwan Commission and urges the Commission to take them under consideration before finalizing recommendations.

MEC urges the commission to recommend and cost out tutoring and other interventions for struggling learners in all grades, not limited to the early grades (critical as they are). The tutoring ratio should be much lower than 125:1.

MEC also supports extended year/summer school as a strong research-based intervention needed to avert summer learning loss. While a few weeks of summer school may be counted in the Compensatory Education Weight, this is not sufficient for students in schools in Concentrated Poverty nor to cover students who are behind academically but not from low-income families.

MEC believes that evidence-based tutoring provided by highly qualified general education, Special Needs or Limited English Education professionals may only address one of several needs required to ensure all students perform academically up to their potential. The counselors, social workers and psychologists the Commission is recommending are critical to help identify and address the root causes of academic delays for some students. Some cases may require qualified health professionals. Characteristics of these students may include:

- Social-emotional or health issues
- Home, environment, or community experiences
- Parent or guardian education level
- Qualifications and experience of classroom educators, especially in diverse classrooms

It is also important to note that some students identified as needing tutoring or additional educational supports may be identified and unidentified and are often under-served Gifted & Talented or Twice-Exceptional students. These students often learn differently and at an accelerated rate. Often, they may be bored, unchallenged, and/or exhibiting behavioral concerns in a classroom that do not have a qualified educator to provide services to Gifted & Talented, Twice-Exceptional or High-ability students. Many educators are in diverse classrooms, based on ability or experience, requiring high quality differentiation of instruction.

Element Detail: 3h – Career and Technical Education Subcabinet
MEC believes the effectiveness and need of a new subcabinet should be discussed further among all stakeholders before formal approval. All stakeholder groups must be part of the subcabinet decision-making process. Stakeholders should include educators, parents, students, and advocates.

MEC believes CTE programs should be standardized; however, local school systems and governments in partnership with their community colleges and local trade schools must have some role in determining what CTE programs are needed in their jurisdiction or region. Programs should not be restricted to industry expectations or needs determined at the state level.

MEC also believes that there should be opportunities available for Special Needs students who demonstrate abilities not found within the existing education accountability systems to participate in CTE programs.

Element Detail: 3j – CTE counselors
MEC supports adding CTE counselors but the state must also commit to adequately support and fund the lowering of the guidance counselor to student ratio based on the national standard of 250 to 1 and psychologists to at least 700 to 1 in the regular school setting at all levels, with much lower ratios for schools with significant and severe levels of poverty.¹

³ NASP Recommendations - The recommended ratio of students to school counselor is 250:1; the recommended ratio for school psychologists is 500-700:1 (NASP Model for Comprehensive and Integrated School Psychological Services), and the recommended ratio for school social workers is 400:1.
There also should be a counseling specialist, especially at the secondary level with expertise on high school course, career and other post-secondary options. This additional person could be identified as a Career Counselor separate from all other responsibilities of public-school counselors.

**Element Detail: 3k – CTE system combining classroom education and workplace learning**

**MEC believes** that consistent with the ESSA and State Policies for Family Engagement, there must be some local control in the decision-making process for this element that includes leadership from local government, community colleges and school systems. Therefore, the state should provide a template, guidelines and support, but it should not be designed to be top down only, with limited or no local control or stakeholder participation in the decision-making process, implementation, operations, or accountability systems.

Expansion also may require increased funding and development of new building facilities, or the customization of existing facilities, to provide quality educational space that meet the needs of each CTE Program.

MEC also will support partnerships with private and non-profit industry/groups provided public dollars are not directly subsidizing private interests.

CTE schools should also meet/exceed arts standards as well.

**Element Detail: 3l – Generic employability skills**

**MEC believes** there also must be a relationship and partnership with local governments, community colleges, and local public-school systems as part of the local decision-making process.

The Maryland Education Coalition (MEC) remains concerned about how the unique diversity within student groups among jurisdictions, school systems and schools can impact the achievement and opportunity gaps, especially within school communities with high concentrations of lower income, special ed, limited English, or minority students. *(See attachment below for a summary of some of our most high-need student groups)*

We also are concerned with the lack of inclusion of the different needs and services required for successful Gifted & Talented students within each Work Group as defined within the Maryland ESSA Plan, current federal and state laws and state regulations, especially if one of the Commission goals is to improve academic performance and opportunities for all students to maximize their college and career ready performance. *(According to the report of the COMMISSION ON FUNDING AND SERVICES for GIFTED AND TALENTED STUDENT EDUCATION IN MARYLAND (page 3), it is estimated that about 12.5% of all students should received Gifted & Talented Education services and their needs should be considered within the overall work of the Commission.)*
## ATTACHMENT 1 - Maryland 2017-18 FARMS and Minority Enrollment, plus At-Risk Student Index

(Developed by Rick Tyler, Maryland Education Coalition, to show the relationship between of FARMS, Minority & At-Risk student enrollment at the state and local level to show the high percentage in all categories in some districts that may impact academic performance, educational opportunity or historic lack of resources.)

<table>
<thead>
<tr>
<th>LEA Name</th>
<th>Total Enrollment *</th>
<th>FARMS Pct **</th>
<th>FARMS Cnt **</th>
<th>Black/ African American *</th>
<th>Hispanic *</th>
<th>Minority Index ****</th>
<th>At-Risk Student Index ***</th>
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<tbody>
<tr>
<td><strong>STATE</strong></td>
<td><strong>893,689</strong></td>
<td>42.8</td>
<td>382,726</td>
<td>301,542</td>
<td>155,346</td>
<td>51.1</td>
<td>Statewide 64.4%</td>
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<td>Allegany</td>
<td>8,629</td>
<td>59.6</td>
<td>4912</td>
<td>284</td>
<td>122</td>
<td>1.4</td>
<td>4.7</td>
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<td>Anne Arundel</td>
<td>82,777</td>
<td>33.0</td>
<td>27349</td>
<td>17,296</td>
<td>12,276</td>
<td>14.8</td>
<td>35.7</td>
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<td><strong>Baltimore City</strong></td>
<td><strong>80,591</strong></td>
<td>61.0</td>
<td>49,135</td>
<td>63,976</td>
<td>8,362</td>
<td>10.4</td>
<td>89.8</td>
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<td>Baltimore County</td>
<td>113,282</td>
<td>47.1</td>
<td>53,342</td>
<td>44,297</td>
<td>10,979</td>
<td>9.7</td>
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<td>Calvert</td>
<td>15,908</td>
<td>22.0</td>
<td>3497</td>
<td>2,044</td>
<td>933</td>
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<td>Caroline</td>
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<td>839</td>
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<td>Carroll</td>
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<td>20.8</td>
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<td>983</td>
<td>1,619</td>
<td>6.4</td>
<td>10.3</td>
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<td>Cecil</td>
<td>15,364</td>
<td>46.1</td>
<td>7084</td>
<td>1,417</td>
<td>1,050</td>
<td>6.8</td>
<td>16.1</td>
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<td>Charles</td>
<td>26,891</td>
<td>36.9</td>
<td>9930</td>
<td>14,884</td>
<td>2,233</td>
<td>8.3</td>
<td>63.7</td>
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<td>Dorchester</td>
<td>4,767</td>
<td>68.4</td>
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<td>1,898</td>
<td>393</td>
<td>8.2</td>
<td>48.1</td>
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<tr>
<td>Frederick</td>
<td>42,140</td>
<td>27.3</td>
<td>11,496</td>
<td>5,112</td>
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<td>Garrett</td>
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<td>50</td>
<td>1.3</td>
<td>1.6</td>
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<td>Harford</td>
<td>37,780</td>
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<td>7,203</td>
<td>2,704</td>
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<td>Howard</td>
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<td>34.3</td>
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<tr>
<td>Kent</td>
<td>1,993</td>
<td>53.7</td>
<td>1,070</td>
<td>457</td>
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<td>8.5</td>
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<td>Montgomery</td>
<td>161,546</td>
<td>36.3</td>
<td>58,856</td>
<td>34,615</td>
<td>49,704</td>
<td>30.8</td>
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<td>Prince George’s</td>
<td>132,322</td>
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<td>83,475</td>
<td>76,881</td>
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<td>91.2</td>
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<td>Queen Anne’s</td>
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<td>26.9</td>
<td>2,096</td>
<td>454</td>
<td>605</td>
<td>7.8</td>
<td>13.6</td>
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<tr>
<td>SEED</td>
<td>400</td>
<td>20.2</td>
<td>81</td>
<td>379</td>
<td>15</td>
<td>3.8</td>
<td>98.5</td>
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<tr>
<td>Saint Mary’s</td>
<td>18,053</td>
<td>33.2</td>
<td>6,001</td>
<td>3,314</td>
<td>1,280</td>
<td>7.1</td>
<td>25.4</td>
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<td>Somerset</td>
<td>2,918</td>
<td>65.4</td>
<td>1,907</td>
<td>1,313</td>
<td>277</td>
<td>9.5</td>
<td>54.5</td>
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<td>Talbot</td>
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<td>45.6</td>
<td>2,118</td>
<td>753</td>
<td>830</td>
<td>17.9</td>
<td>34.1</td>
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<td>Washington</td>
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<td>48.6</td>
<td>10,980</td>
<td>2,979</td>
<td>2,083</td>
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<td>Wicomico</td>
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<td>59.5</td>
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<td>1,476</td>
<td>9.9</td>
<td>46.5</td>
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<td>2,939</td>
<td>1,265</td>
<td>487</td>
<td>7.3</td>
<td>26.2</td>
</tr>
</tbody>
</table>

- **Bold/above Average**
- **LEAs with above average FARMS & Minority Index**
- Maryland defines At-Risk for funding purposes as those students identified as children with disabilities, ELL or FARMs

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*Enrollment in Maryland Public Schools by Race/Ethnicity: September 30, 2017*, page 1 - MSDE

** 2017 Students Receiving Special Services Data – MSDE, Maryland Report Card 2017 - Data Downloads. For CEP districts, FARMS data is not available and represents only directly certified (Free Meals income-level) students.

*** Overview of Education Funding in Maryland, January 23, 2018, page 17 – DLS, At-Risk Index – Compensatory, Limited English & Special Ed enrollment

**** Percentage of Total Enrollment of African-American & Hispanic Students (Developed by Rick Tyler using MSDE Data Downloads to show the percentages of African-American & Hispanic Student concentrations by local school system) NOTE: It has been suggested to also add Native Americans & Pacific Islander