

MONTGOMERY COUNTY BOARD OF EDUCATION

850 Hungerford Drive ♦ Room 123 ♦ Rockville, Maryland 20850

November 1, 2018



Dr. William E. Kirwan, Chair
Maryland Commission on Innovation and Excellence in Education
c/o Office of Policy Analysis
Department of Legislative Services
90 State Circle
Annapolis, Maryland 21401

Dear Dr. Kirwan:

On behalf of the Montgomery County Board of Education, we would like to offer comments about the current tentative recommendations that have been shared by the Maryland Commission on Innovation and Excellence in Education (Commission) as of the Friday, September 21, 2018, meeting. Overall, we strongly support investments in early education, moving the high school college and career readiness indicator to Grade 10, and a robust set of pathway options for students. We appreciate the large amount of work and research the Commission has accomplished to attempt to bring the current state of education into the global economy. However, the overall lack of information on the costs and funding sources, coupled with the lack of details about how many of these recommendations would be implemented make it difficult to assess the impact on our school system and students. Many of the recommendations appear to be quite costly and we have concerns about not only how much implementation would cost, but also how those increased costs would be funded. Although we offer thoughts and concerns, we look forward to more extensively engaging in a dialogue when we are able to view the cost evaluations.

General Comments:

- The Commission has been working since September 2016, with the majority of work being done upon the formation of four work groups in summer 2018. Although all meetings are public and can be viewed by any interested stakeholders, there has not been a formal mechanism for collecting feedback since the work groups began their work. Some work groups have accepted testimony more readily than others, but there have not been public forums for comment. To date, the opportunity for meaningful feedback from stakeholders, including local school systems, has been limited, especially with recommendations that do not yet have cost calculations associated with them. We would welcome the opportunity for comment and dialogue on the recommendations as the cost evaluations are completed. We believe this is fundamental to the democratic process.
- We are concerned about the [public statement made by Speaker of the House Michael Busch on Center of Maryland in September 2018](#) about operating aid increases. The Speaker clearly names Montgomery, Howard, and Anne Arundel as three counties that would receive less as far as operating aid increases, possibly in exchange for school construction (which may result in more funds for construction, but that is unclear in the comments). These comments seems to harken back to “Chart 6.7a” in the [APA Adequacy Study](#) that was sponsored by the Commission. Chart 6.7a indicates an overall increase in state aid of

\$1.9 billion and an overall increase in local aid of \$1.0 billion. But those totals included increases in state and local aid for some counties and decreases for others. Based on Fiscal Year 2015 data, Montgomery County would lose 63 percent (\$354 million) in state aid. This indicates that an insurmountable challenge lies ahead for Montgomery County in obtaining and/or maintaining a fair share of state operating aid, especially as Montgomery County continues to service a growing English Learner (EL) community and more students receiving Free and Reduced-priced Meals System (FARMS) services.

- We hope that as the members of Commission consider the changes caused by these recommendations that they also review the current requirements for the Bridge to Excellence Master Plan. Current legislation has pared down what is required in the Master Plan, but that legislation is about to sunset. Any legislation resulting from these recommendations must also include revisions to the Master Plan requirements to ensure those reports are more accurate, descriptive, and aligned with the goals and accountability measures set forth in the state's *Every Student Succeeds Act of 2015* (ESSA) plan.
- We understand that the work of accountability is being conducted as a whole Commission. We recommend that whatever accountability model is developed that special attention is considered to ensure it is implementable and focused on rigor for all, eliminating disparity based on race and economic circumstances. It must also show progress for EL and special education students that is appropriate and useful in planning, programming, and instruction.

Work group #1—Early Childhood Education

- In our view, universal prekindergarten (pre-K) is an imperative, and we agree that it must be made available to all students. The expansion of pre-K is integral to kindergarten readiness. We know from the data that the foundational skills needed at the primary level are important. We support the original goal of this work group “to expand high quality pre-K to **all** low-income 4-year-olds and **all** low-income 3-year-olds, and assesses all children to identify those who need supports to be ready to learn” (Emphasis added).
- We do not believe that the “sliding scale” model for 4-year-olds will garner the participation of all families in Montgomery County and may result in clusters of low-poverty students in pre-K classes across the local education agency (LEA). Sliding scales also have the potential to hinder working families (see information in bullet below). We would favor providing support for all 4-year-olds and ultimately phasing in 3-year-olds.
- The poverty metric for 3-year-olds also is troublesome. The “cliff model” of students below 300 percent poverty, where a minor increase in income causes a loss of child care or, in this case, pre-K programs, has been documented to negatively impact the families we are trying to support. In fact, Governor Larry Hogan’s executive order, [Two-Generation Family Economic Security Commission and Pilot Program](#) plan of action in 2017 specifically resulted in [recommendations](#) to align community supports to create a network of transitional services. The recommendation to create a cliff model for pre-K services for 3-year-olds seems in direct contradiction to this approach.
- We appreciate the consideration that Local Education Agencies (LEAs) may need to partner with community and private organizations in order to increase capacity within the county to offer additional pre-K services. However, the suggestion that “the state will require that a minimum percentage of full-day pre-K slots in each local education agency be provided in participating

community-based settings...” and “remain constant at 50% beginning in year 5,” is both limiting and troubling. Public education is in the purview of the local boards of education. The powers and mandatory duties of the Board of Education are defined in the [Education Article of the Annotated Code of Maryland](#) (Art. § 4-101 through § 4-108). The Board’s primary responsibilities, aligned to support the strategic plan of the school system, include, but are not limited to—making decisions on educational, budgetary, **facility**, and financial matters (emphasis added). Although local school systems may receive a waiver from this provision, it seems arbitrary to institute such a cap. We feel strongly that we should be able to enter into partnerships as necessary without having to minimize the option for public space and public programs and would support a range of percentages for partnerships, perhaps a one-third to two-thirds model, which would accomplish the intent of the recommendation while also preserving local autonomy.

- We encourage the Commission and the work group to consider special emphasis for early childhood programs for students with disabilities and not just use poverty as a measure. Research indicates that it is imperative to provide as many early interventions to students with disabilities in full-day settings as early as possible (especially if they are not income eligible).

Work group #2—High-quality Teachers and Leaders

- We support the intent to have higher paid, better educated, more rigorously trained teachers to work together in teams to continuously improve their practice and improve the performance of all students.
- We strongly support a statewide public relations and communications initiative to rebrand teaching as an attractive career and attract students from diverse backgrounds. This includes incentivizing teachers with loan forgiveness and scholarships, as well as increasing teacher salaries, where possible and appropriate.
- We have concerns about moving to the untested edTPA test as the assessment for passing teacher education programs and for certification to teach in Maryland. This assessment has received mixed results in its overall effectiveness. In a [survey by researchers at the University of Rochester’s Warner School of Education](#), 77 percent said “The test was an unfair assessment of their teaching practice and very time-consuming, with a majority disagreeing that it helped them be more organized during their student teaching.” We believe in using multiple measures to determine teacher preparedness. Furthermore, as a state that depends on recruiting teachers from other areas of the country, this very time consuming assessment, which requires a portfolio and unedited videos of the student teaching, may actually dis-incentivize individuals from wanting to teach in Maryland.
- We are concerned about the approach to a statewide career lattice that has been recommended in this work group.
 - » Specifically, the devaluing of the master’s degree and the elevation of teachers certified by the National Board for Professional Teaching Standards (NBPTS), seems to be lacking data on the effectiveness and rationale behind this new pathway. The Institute of Education Sciences (IES) contracted with the National Research Council to evaluate the impact of Board certification. The [report](#) stated that insufficient evidence exists to draw conclusions regarding the impact of certification on teacher outcomes such as classroom practices and mobility, that evidence regarding whether the certification process improves teachers’ classroom effectiveness is inconclusive, and that it was not possible to conduct a cost-effectiveness evaluation of Board certification. Importantly, the final finding was due to the

scarcity of information on the benefits of Board certification and both the costs and benefits of alternative mechanisms for improving teacher quality, such as earning a master's degree. Furthermore, despite the extensive state interest in using the NBPTS assessment as a marker of teacher quality for human capital purposes, the extant research on the effectiveness of National Board-Certified Teachers has generated inconsistent results ([Cowan and Goldhaber, 2016](#)). We believe that teachers should continue to have the option of National Board Certification and be rewarded for completion of the work; however, we are hesitant to agree that this certification should be more rewarding than other means of furthering one's education. We are concerned the proposed lattice appears to devalue and minimize experience. We respectfully oppose the elevating of NBPTS teachers over teachers earning a master's degree.

- » Additionally, the career lattice purposefully indicates that master teachers are equivalent to licensed principals and professor master teachers are equivalent to master principals. We are concerned that the preparation for and selection process to fill these positions are not the same, and this equating of the two does not come with any details as to how this would be implemented. This plan also may unintentionally dis-incentivize people from choosing to follow a career path in school leadership and administration; positions that are critical to the success of a school.
- » It is unclear how teachers would renew their certifications. Without this information and further explanation as to how the new qualifications may impact current teachers, we are concerned of the potential impact on our current teaching force.
- » We are grateful for the recognition of principals and assistant principals as the instructional leads in the school and appreciate the notion that teachers should only be in the classroom 60 percent of the time (with principals and assistant principals in the classroom 10 and 20 percent of the time, respectively). However, no details have been shared that indicate how this approach would be funded, given that it would likely require large funding increases. Additionally, clarity about how this approach would impact the running of the school and the day-to-day operations noticeably is lacking.
- » We concur with the [concern submitted by Baltimore City Public Schools](#) that “the very detailed plan for career ladders may excessively limit local educational agencies ability to develop and/or maintain their own thoughtful career ladders.” We support the notion of a framework for a career lattice, but believe LEAs should be responsible for building out the processes and pathways.

Work group #3—College and Career Readiness

- We support an instructional system that enables Maryland high school graduates to reach the College and Career Readiness (CCR) goals set forth by the work group. We also agree that a robust set of post-CCR program pathways is imperative. However, there must be an explanation of how funding will be increased to meet the expenses of incorporating these additional programs into the school systems' already constrained budgets.
- We support the concept that we must have postsecondary options for students, other than college, based on their interests. We would like more information on how work at the elementary and middle school levels will be required to change in order to meet the Grade 10 expectation. Our policies,

programs, opportunities, and level of rigor for all students in elementary and middle schools must prepare them for all program options in higher education and career pathways in high school.

- We believe that students should be able to reach this CCR standard by the end of Grade 10, but acknowledge that not all students are ready and prepared to meet this standard currently. We appreciate the work group's acknowledgement that it will take approximately 10 years for the majority of students to meet the revised CCR standard by the end of Grade 10.
- We remain concerned about the clarity of supports to be offered to students who are unable to meet the standard by the end of Grade 10. Both detail in how these supports will be offered and funded are of concern and importance to us.
- The recommendations currently state that "schools identified as low-performing by their scores on statewide assessments will be visited by inspection teams assembled and working under the supervision of the Maryland State Department of Education (MSDE); based on what they find, those teams will recommend courses of action for addressing the problem revealed by the inspection. Among those options is requiring a school to use the state courses as designed until such time as its students are on track to meet the CCR standards by the end of 10th grade" (page 4). We strongly oppose any measure to enforce a statewide curriculum or statewide courses/units of instruction, etc. Curriculum is expressly the responsibility of the LEA. MCPS has redesigned its curriculum and has worked with community stakeholders to build "buy-in," professional development, and a community understanding. Forcing local school systems to use a state curriculum would not only serve to diminish the community support for the current, revised curriculum, but it also potentially creates a misalignment between schools within our school system. MCPS already has instructional materials that align to the state standards and believe that assessments also should align to those standards. We strongly support the local board of education's autonomy to complete these alignments. Additionally, we are concerned about how professional development for teachers in the identified schools will be supported. These educators would require additional professional development on the state-mandated curriculum that may impact professional development days and could impact professional development budgets. Finally, we would like more clarification on how assessments would be impacted by the change in curricula for these schools.
- Work group #3 also proposes a new "Career and Technical Education [CTE] Subcabinet" in state government to, among other things, take the lead on developing the framework for the state's CTE system, approving CTE programs, and benchmarking Maryland's system against the best CTE systems in the world. MCPS groups careers into [11 different CTE clusters with 39 programs of study across 28 schools](#). We are proud of the success of our students and our programs. The creation of a subcabinet to oversee this work, currently developed in partnership with MSDE, is a bureaucratic obstacle that will hinder the flexibility and innovation used at the local level. MCPS has overhauled our CTE program, including a comprehensive review of CTE programming, and we are currently working with the Board's Policy Management Committee to update our current CTE policy. We strongly oppose a subcabinet being created to impose on this work. A statewide subcabinet could easily serve to undermine the successful programming and flexibility that is used to help our MCPS students succeed. We respectfully submit that what is needed is more on-time alignment to industry needs and certifications, which is information that can be shared with the LEAs as they design and revise programs.

- Additionally, the work group has suggested the creation of a Skills Standards Board comprising employers to set the standards for a system of work-based learning and apprenticeships. MCPS has a strong history of [partnerships](#) with businesses and institutions of higher education. Again, we oppose any encroachment on our responsibility to work with our local business and higher education community to provide meaningful opportunities to our students. The work of creating curriculum and aligning with the broader workforce should remain the purview of the county boards of education. MCPS is currently pursuing working in regional roundtables that extend outside the borders of the state. We respectfully recommend that these roundtables are an effective way to create partnerships around workforce needs without creating another Board and removing local board decision making.

Work group #4—More Resources for At-risk Students

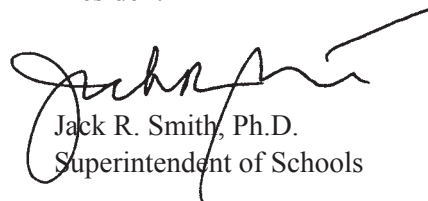
- We recognize the importance of providing additional funding and resources for schools with concentrated poverty levels. However, MCPS also seeks to create more diverse schools and improve the overall quality of students' lives. The additional funds for schools in concentrated poverty (which is yet to be defined), may disincentivize schools and systems from decentralizing poverty. Such actions also may limit the ability of LEAs to determine boundaries, clusters, and choice programs.
- Additionally, it is not clear what the threshold for “concentrated poverty” will be and how poverty will be measured (free meal eligibility, Free and Reduced-price Meal System eligibility, direct certification, etc.). Proposing to use a sliding scale to determine the funding for schools based on their poverty level could drastically change the way schools are funded and the resources they receive. Without the exact formulas, it is hard to determine the impact on our individual schools and communities. We believe strongly that whatever measure is used to determine poverty, we must continue to ensure it is a measure that allows families to be able to attest to need without prejudice from immigration status. Additionally, we believe it is crucial to see the actual formulas that will be used, including the “inputs” for those formulas.
- Because a special education study was required by legislation ([HB 1415](#)) and the results will not be available until December 2019, the current work group is suggesting a placeholder weight for funding special education students. We acknowledge that the weight may change when that report is complete, but currently support the stop gap weight of 2.18 for special education students. We appreciate the efforts to continue to provide support for all students with a recognition of the extra resources necessary for those students with disabilities.
- While acknowledging the services necessary for special education students, it appears that the work group recommends decreasing the weight for EL. The work group states that “because most of EL students also qualify for compensatory education funding, the compensatory education weight will provide for academic and social/emotional supports.” We respectfully disagree that these are the same students. For example, preliminary data in MCPS demonstrate that only approximately 24 percent of EL elementary school students also receive FARMS services. We oppose any efforts to discount the resources needed for all students.

On behalf of the Montgomery County Board of Education, thank you for the work you and the Commission are doing and continue to accomplish. We strongly support the Commission's charge to update the current funding formulas and to make policy recommendations that would enable Maryland's P-12 system to perform at the level of the best performing systems in the world. We support investments in early education, moving the high school CCR indicator to Grade 10, and a robust set of pathway options for students. We also support professionalizing and incentivizing the teacher career pathway. We look forward to continuing this dialogue and providing further information and testimony as this process continues. Please do not hesitate to contact us if we may be of further assistance as the Commission completes its work this winter.

Sincerely,



Michael A. Durso
President



Jack R. Smith, Ph.D.
Superintendent of Schools

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Copy to:

Members of the Board of Education
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