



January 16, 2019

Dr. William E. Kirwan, Chairman  
Maryland Commission on Innovation and Excellence in Education  
Sent by electronic mail  
[PreK-12InnovationandExcellenceCommission@mlis.state.md.us](mailto:PreK-12InnovationandExcellenceCommission@mlis.state.md.us)

Dear Dr. Kirwan and members of the Commission:

We write to raise concerns about the draft proposed FY20 program list (\$200-\$325 m.) presented at the end of the last Commission meeting. While there are worthy items on the list that are relevant to the Commission's recommendations, the programs and funding appear to have little or no connection to the current adequacy gaps in funding across school systems.

Both the Department of Legislative Services' Adequacy Analysis (based on the current formula) and the Augenblick and Palaich Adequacy Study (based on their methodologies) have assessed the adequacy gaps per pupil and by school system. These gaps vary widely across the state, indicating that needs are not equal, with no gap (as of FY15) in some counties and up to \$4529 per pupil in Prince George's.

Adding funds for various programs without considering that systems are at different levels of insufficient funding now can compound the inequity across the state. We know, for instance, that a recent analysis by the Maryland Center for Economic Policy found that only 8% of White students in the state attend schools that are substantially underfunded while 53% of Black students attend schools that are.

It is not possible for us to deduce what level of inequity could be fostered because key details were not presented at the last meeting- e.g., will the teacher salary increases be wealth-equalized in the state/county share, as is most of education formula funding? If so, that would be a recognition that counties vary in their ability to pay their share and not dis-incentivize accessing that funding for teachers. Similarly, would the additional special education funds be distributed according to the current formula?

We understand that you do not intend to propose formula funding at this stage. But we urge the Commission to consider existing adequacy gaps as you determine which programs and funding streams to recommend for FY20 and beyond so that additional funding addresses adequacy and equity gaps and does not exacerbate them.

Sincerely,

Bebe Verdery  
Education Director, ACLU of Maryland

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